

## UNITED STATES DISTRICT COURT

for the

Northern District of California

**FILED**

Jul 02 2024

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

United States of America

v.

Tobias Dylan Scollay,

Case No. 24-mj-71007-MAG

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June - July, 2023 in the county of Solano in the  
Northern District of California, the defendant(s) violated:*Code Section*

18 U.S.C. §§ 1591; 371

*Offense Description*

Enticed, recruited, maintained, and/or transported a minor victim who had not reached the age of 18, to engage in a commercial sex act.

Maximum penalties:

20 years imprisonment; \$250,000 fine; 3 years supervised release; restitution; \$100 special assessment; forfeiture

This criminal complaint is based on these facts:

See attached affidavit of Homeland Security Investigations Special Agent Brittany Portez.

☒ Continued on the attached sheet.Approved as to form: /s/ Evan M. Mateer  
AUSA EVAN M. MATEER/s/ Brittany Portez*Complainant's signature*

Brittany Portez, HSI Special Agent

*Printed name and title*Attested to by the applicant in accordance with the requirements of  
Fed. R. Crim. P. 4.1 by telephone.Date: 07/02/2024*Judge's signature*City and state: Oakland, California

Hon. Donna M. Ryu, Chief Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Brittany Portez, a Special Agent with the Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in San Francisco, California, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I make this affidavit in support of an application under Rule 4 of the Federal Rules of Criminal Procedure for a Criminal Complaint and Arrest Warrant authorizing the arrest of **Tobias Dylan SCOLLAY** for enticing, recruiting, maintaining, and/or transporting a minor victim who had not reached the age of 18, to engage in a commercial sex act, and such actions were in or affected interstate commerce, in violation of Title 18 U.S.C. § 1591 and that **Tobias Dylan SCOLLAY** and a co-conspirator conspired to entice, recruit, maintain, and/or transport a minor victim who had not reached the age of 18, to engage in a commercial sex act, and such actions were in or affected interstate commerce, from May 2023 through November 2023 in the Northern District of California, in violation of Title 18 U.S.C. § 371.

2. In connection with my official duties, I have participated in the investigation of **SCOLLAY** and his co-conspirator for the aforementioned offenses since on or about May 10, 2023. In connection with my official duties, I have obtained the following information from my investigation. Due to my personal participation in this investigation, I am familiar with the facts and circumstances of this case. My experience as an HSI Special Agent and my participation in this investigation form the basis of the opinions and conclusions set forth below.

3. Because this affidavit is submitted for the limited purpose of this criminal complaint, I have not included each and every fact known to me about this investigation. Rather, I have set forth those facts that I believe are sufficient to establish probable cause that **Tobias**

**Dylan SCOLLAY** and his co-conspirator committed the aforementioned offense.

#### **AGENT BACKGROUND**

4. I have been employed as a Special Agent (SA) with Homeland Security Investigations (HSI) since November 2021. I was previously employed by HSI from June 2016 until October 2017, and prior to that, served as a Deportation with U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations from 2011 until 2016. I am currently assigned to the Homeland Security Investigations Office of the Special Agent in Charge in San Francisco, CA, where it is my primary duty to investigate individuals involved in human trafficking and the sexual exploitation of minors. As a part of my duties, I investigate criminal violations by persons relating to the online coercion and enticement of minors to engage in illegal sex acts, as well as the sex trafficking of minors.

5. During the course of my career, I have participated in several cases involving the investigation of illicit sexual activity, including physical surveillance, execution of search and arrest warrants, and analysis of wireless telephones. I have interviewed numerous defendants, victims, and witnesses who have been involved in illegal sexual activity. I have spoken with other experienced investigators in the field of illegal sexual activity related investigations, concerning the methods and practices of those currently, or attempting to, exploit children through sex tourism, sex trafficking, and production of child sexual abuse material. Furthermore, I have attended training courses specialized in the investigation of illegal sexual activity related cases, as well as educated others on how to identify human traffickers and their victims.

6. As an HSI agent, I am authorized to investigate violations of United States law and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States. I am an investigator and law enforcement officer of the United

States within the meaning of 18 U.S.C. § 2510(7). I am empowered by law to conduct investigations, to execute search warrants, and to make arrests for offenses of Federal law, including offenses enumerated in 18 U.S.C. § 1591.

### APPLICABLE STATUTES

7. Title 18 U.S.C. § 1591(a)(1) prohibits an individual from knowingly in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person.

8. Title 18 U.S.C. § 1594 provided that whoever attempts to violate section 1581, 1583, 1584, 1589, 1590, or 1591 shall be punishable in the same manner as a completed violation of that section.

9. Title 18 U.S.C. § 371 provides that if two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.

### FACTS ESTABLISHING PROBABLE CAUSE

10. Over the course of June and July 2023, **SCOLLAY** and his co-conspirator (“D.M.”) engaged in a conspiracy to entice three minor victims—ages ranging from 13 years old to 17 years old—to engage in commercial sex work. D.M. was **SCOLLAY**’s “bottom” girl. As such, the two worked together to run the commercial sex work venture, including the efforts to recruit their minor victims. **SCOLLAY** relied heavily on the assistance of D.M., who helped provide the minor victims with suitable outfits, made contact with them online or in person, agreed to look after them when they were on the streets, and worked to arrange for transportation. Ultimately,

each of the three minor victims engaged in commercial sex work on **SCOLLAY**'s behalf on at least one occasion in Oakland, California. After **SCOLLAY** was arrested on unrelated charges, he and D.M. engaged in a series of recorded jail calls where they reaffirmed their conspiracy, with D.M. agreeing to work to recruit the second minor victim to engage in commercial sex work for **SCOLLAY** when he was released.

**A. Investigators learn that SCOLLAY is engaged in sex trafficking Minor Victim #1**

11. On May 10, 2023, Special Agents, working with the United States Marshals Service (USMS) Missing Child Recovery Unit, were contacted by Santa Clara County District Attorney (SCCDA) Investigators to assist with the location of a thirteen-year-old minor female victim, MV1.<sup>1</sup> MV1 was reported being commercially sexually exploited on the Vallejo, CA “blade”<sup>2</sup> and in possession of a cellular telephone device bearing telephone number ending in 9078.

12. SCCDA Investigators were granted an exigent cell-site location “ping” for the cellular phone, as well as a record of calls made and messages sent during the time of MV1’s disappearance. Those records were provided to HSI San Francisco for review, which revealed one of the most frequently called individuals between May 7, 2023, and May 8, 2023, was telephone number ending 9243. An open-source query (later supported an HSI subpoena to T-Mobile)

---

<sup>1</sup> MV1 is known to law enforcement.

<sup>2</sup> Based on my training and experience, and knowledge of this investigation, I believe the following to be true: street level sex work occurs in certain areas of Vallejo and Oakland, California. I know this to be true from speaking with Oakland Police Department Vice officers and Solano County Sheriff’s Deputies assigned to investigate human trafficking investigations. Areas where street level commercial sex is conducted are commonly known as “blade,” “strip,” or “stroll.” In Vallejo, street-level commercial sex occurs in areas on and around Sonoma Boulevard and Ohio Street—the “Vallejo Blade.” In Oakland, street-level commercial sex occurs in areas on and around International Boulevard—the “Oakland Blade.” Sex workers often have exploiters/traffickers, known as “pimps,” who attempt to influence them to become, or continue to engage, in commercial sex work. Exploiters/traffickers also direct the activities of sex workers and derive support or revenue from another for their work as a sex worker, including providing protection or services to sex workers in exchange for a share of the earnings or proceeds, in violation of Federal and California State law. Persuading, or trying to persuade, a minor to engage in a commercial sex act is a violation of 18 U.S.C. § 1591 and 1594.

identified the telephone number as subscribed to by Tobias **SCOLLAY**. Agents attributed approximately sixty-six (66) calls between MV1 and **SCOLLAY** between May 7, 2023, and May 8, 2023. HSI Analysts plotted MV1's location based on cell-tower information provided by Verizon Wireless, which revealed MV1 was in the Vallejo area on May 7, 2023.

13. On May 11, 2023, the Oakland Police Department recovered MV1 from the Oakland Blade, an area known to be frequented by human trafficking victims and their exploiters, on International Boulevard and 20th Street in Oakland, CA. During a subsequent interview with Santa Clara County District Attorney Investigators, MV1 alleged to have been trafficked by another individual, his minor girlfriend, an adult female, and another adult male. Santa Clara County District Attorney Investigators questioned the individual about the allegations, but Santa Clara County District Attorney Investigators believed there was not sufficient evidence to charge him with trafficking MV1. The adult female provided evidence in support of MV1's statements against the other adult male. That adult male was charged, plead guilty, and was sentenced to eighteen (18) years prison.

14. On June 6, 2023, I was contacted again by SCCDA Investigators who advised that MV1 went missing from the group home on or about June 1, 2023. On June 14, 2023, SCCDA Investigators received information from MV1's mother. Specifically, MV1's mother received a message that was recorded by a female, later identified as D.M.. In the recording, D.M. stated that MV1 told her she was eighteen and, "is fuckin with a nigga who is twenty-five (unintelligible) he pimpin her out and she's with him right now." D.M. further described "he pushed her...he pushed her and he choked her. Yeah." Per SCCDA Investigators, MV1 was suspected of being at a hotel in Oakland with a pimp, where the pimp was having sex with MV1, and the pimp was driving a white-colored Mercedes. Investigators believed MV1 was presently at the Oakland Executive

Airport Hotel, located at 150 Hegenberger Road, Oakland, CA.

15. USMS Inspector Jerome Sun and I, with the USMS Missing Child Recovery Unit, spoke to hotel security staff, G.M. G.M. recalled seeing MV1 with another young-looking female and an older male, driving a white Mercedes. The hotel desk clerk provided the hotel registration information for the individual, which indicated that hotel room 251 was rented and paid for by **Tobias SCOLLAY**. The vehicle associated with the room was listed as a white Mercedes Benz bearing California Temporary license plate CF53N13. The hotel desk clerk also provided colored photocopy of an Emotional Support Animal identification card, listing an animal name “Oreo,” breed of “Chihuahua” and handler name of D.M. I called SCCDA Investigators, who were also dispatched to the scene. While on scene, District Attorney Investigator Corinne Abernathy observed an individual matching the photograph of **SCOLLAY** as depicted on his California Driver’s License, walking through a hallway of the hotel. The Oakland Police Department was contacted to assist with a welfare check in room 251.

16. On that same day, law enforcement recovered MV1 from room 251. **SCOLLAY** and D.M. were not present in the hotel room at the time of MV1’s recovery and were not arrested for the offense. Upon her recovery, MV1 had in her possession a cellular phone device bearing telephone number ending 3108. MV1 gave law enforcement permission to review her cellular phone device. The device was seized by the Santa Clara County District Attorney Investigator’s Office.

#### **B. Investigators interview of MV1 regarding SCOLLAY’s conduct**

17. MV1 was taken to the Child Advocacy Center in San Jose, CA. While in route, MV1 provided statements to law enforcement about engaging in commercial sex work on the Oakland Blade between June 12 and June 14, 2023. When law enforcement arrived at the Child

Advocacy Center for a more formal interview, MV1 apologized and told law enforcement she lied in her previous statements because, according to MV1, she did not want to get anyone in trouble.

18. MV1 was interviewed by Santa Clara County DA Senior Investigator Joshua Singleton and Investigator Corinne Abernathy. MV1 told Singleton and Abernathy that she initially met the man she was with, identified by photograph as **Tobias SCOLLAY**, when she was with a previous trafficker in Vallejo, CA. According to MV1, **SCOLLAY** approached MV1 while she was standing on the street engaged in commercial sex work. **SCOLLAY** asked MV1 if she wanted to “come home<sup>3</sup>” with him because he was a “pimp.” MV1 explained that “going home” means “he is trying to trap you, to make the money for you, for him.” Senior Investigator Singleton clarified, asking if MV1 meant that the male subject was recruiting her. MV1 affirmed. According to MV1, she told **SCOLLAY** that she could not go home with him, because she had “folks” (another trafficking group) around. MV1 noticed that **SCOLLAY** had another female seated in his vehicle. **SCOLLAY** “put the girl down” with MV1 in Vallejo, in an attempt to recruit her into engaging in commercial sex work on his behalf. MV1 told investigators she walked away from the female and had not heard from **SCOLLAY** until recently.

19. MV1 described leaving the Welcoming Center in San Jose, CA in early June and working for another pimp. MV1 described leaving that pimp because he accused her of stealing his wallet and returning to the Oakland Blade near 6th Street and International Boulevard. While on the “blade” she found “the guy that I am with right now” (referring to **SCOLLAY**). MV1 clarified her statement saying that **SCOLLAY** found her, that **SCOLLAY** had been “trying to get me, a month or two ago, ever since I have been in Oakland.” MV1 met **SCOLLAY** a second time

---

<sup>3</sup> Based on my training and experience, I know sex traffickers will use the term “come home” to entice trafficking victims to engage in commercial sex work on their behalf. This is a common phrase used by **SCOLLAY** (and repeated several times throughout this affidavit) when he is attempting to entice sex-trafficking victims to engage in commercial sex work on his behalf.



on the Oakland blade near 6<sup>th</sup> and International Streets on Monday, June 12, 2023, after she left the other pimp.

20. According to MV1, **SCOLLAY** approached her in his vehicle, parked the vehicle, got out and gave MV1 a big hug. She said that she also gave **SCOLLAY** a big hug. MV1 asked **SCOLLAY** why he came looking for her. **SCOLLAY** told MV1, “Girl I’ve been looking for you.” She asked **SCOLLAY** how long he had been looking for her and he told her since the day he met MV1. According to MV1, **SCOLLAY** continued to hug her and she continued to hug him. **SCOLLAY** asked MV1 if she wanted to go home with him, and MV1 agreed. According to MV1, **SCOLLAY** became so excited MV1 finally agreed to go with him that he “jumped.” MV1 believed **SCOLLAY** had been trying to “get” her for the past few months, but she continuously rejected him.

21. MV1 told Investigators she lied to **SCOLLAY** about her age and she understood **SCOLLAY** could get into trouble because of her age. MV1 told **SCOLLAY** she was eighteen years’ old. Investigators asked why MV1 had told **SCOLLAY** that she was 18 years old. She replied, “He wanted to know my real age because he knew I wasn’t 18.” MV1 said that she never told **SCOLLAY** her real age. When asked why she believed that **SCOLLAY** knew that she was not 18 years old, she told Investigators that **SCOLLAY** had told MV1 that he did not believe she was 18 years old.<sup>4</sup>

22. After MV1 agreed to go home with **SCOLLAY**, she entered into his vehicle and they “went to pick up the other girls he had,” who were on the next block over, on International Boulevard in Oakland, CA. MV1 identified one of the girls as D.M. and another she knew as “J”,

---

<sup>4</sup> Based on my understanding of MV1’s statements to law enforcement, she told **SCOLLAY** she was eighteen (18) years old because she understood he would get into trouble if he knew she was not. According to MV1, **SCOLLAY** did not believe her when she told him she was eighteen, and she knew this because **SCOLLAY** told her he did not believe her.

later identified as Minor Victim #2 (MV2).<sup>5</sup> After **SCOLLAY** picked up the other two girls, the four of them went to the Oakland Airport Executive Hotel. MV1 recalled that D.M. and MV2 were “trippin’ off of” MV1 being present. Both girls told MV1 and **SCOLLAY** that they were unhappy that **SCOLLAY** brought back MV1. MV1 said they were mad that **SCOLLAY** had “thirty feet.” Investigators asked what the term “thirty feet” meant. MV1 replied, “she (MV2) got 10 toes, D.M. got 10 toes, I got 10 toes. Like he got 30 feet that he can work with.” Investigators asked what that meant. She replied, “He got 3 bitches, he puts them down, and makes more money.” Investigators reminded MV1 that she had told them earlier that “putting them down” was term she was using for going out to the blade to work as a commercial sex worker. MV1 replied, “what are you trying to ask me?” MV1 informed investigators that both MV2 and D.M. were mad that **SCOLLAY** had brought MV1 back. She again informed Investigators again that **SCOLLAY** had been trying to get MV1 for some time.

23. MV1 told Investigators that MV2 and D.M. got out of **SCOLLAY**’s car when they arrived at the hotel and immediately went up to the room. MV1 and **SCOLLAY** remained in the vehicle. **SCOLLAY** advised MV1 that MV2 was upset that **SCOLLAY** had picked MV1 up. MV1 told **SCOLLAY**, “if the bitch wants me to leave, I’ll leave.” **SCOLLAY** told MV1 that he would kick MV2 out and he would keep MV1. MV1 told **SCOLLAY** not to kick MV2 out because MV2 was from Los Angeles, that MV1 and D.M. were both from San Jose. MV1 and **SCOLLAY** went upstairs to the room. MV1 told investigators that D.M. wanted alcohol, so they went to go get alcohol. MV1 said that D.M. got drunk and was “off the hook.”

24. On Tuesday, June 13, 2023, MV1 and **SCOLLAY** went to run errands and, upon their return, found D.M. and MV2 to be missing, along with some of **SCOLLAY**’s personal

---

<sup>5</sup> MV2 is known to law enforcement.

belongings. MV1 and **SCOLLAY** found D.M. and MV2 had gone with the pimp that MV1 previously left. **SCOLLAY** and MV1 returned to the hotel, and **SCOLLAY** left shortly thereafter to go to another store. While **SCOLLAY** was away, MV1 cleaned the hotel room where they were staying. When **SCOLLAY** returned he thanked MV1 and informed her that she should have come home with him sooner. MV1 told **SCOLLAY** that she had felt uncomfortable earlier.

25. Investigators asked how much money MV1 gave to **SCOLLAY**. She quickly replied, “No he didn’t want the money, he didn’t want none of the money.” Investigators reminded MV1 that she previously said that she had given **SCOLLAY** money. MV1 confirmed that was correct and clarified saying that she had given **SCOLLAY** money to get “outfits.” When asked how much money she gave **SCOLLAY**, she told Investigators, “The only money I have was like \$200.00.” She advised that **SCOLLAY** had spent \$280.00 on her and informed Investigators that **SCOLLAY** had bought the black plastic jacket that she was currently wearing. **SCOLLAY** had also bought her two other outfits and makeup. Investigators asked where **SCOLLAY** bought the outfits from. She told us that **SCOLLAY** had bought the outfits from “The Hoe Store,” referring to the store Investigators had identified with her earlier as “Virgin’s Only,” located at 1937 Fruitvale Avenue, Oakland, CA. MV1 told Investigators that everyone went to that store because there were three stores all right next to each other. MV1 told Investigators she had been to all three stores.

26. Investigators asked MV1 if she had had a sexual relationship with **SCOLLAY**. MV1 initially denied any sexual relationship with **SCOLLAY**, then later admitted to having sex with **SCOLLAY** once.<sup>6</sup> Investigators asked when the sex occurred. She advised it was Tuesday,

---

<sup>6</sup> In a statement made to Santa Clara County Investigators on June 14, 2023, in reference to having sex with the adult male, who is also facing state charges for trafficking MV1, MV1 told investigators, “That’s what all the pimps have to do. They have to fuck with the condom. Once they bring the girl home they have to fuck with the condom on. At least for a week or so.” MV1 said that was one of the rules for the

June 13, 2023, in the hotel room. MV1 noted that D.M. was outside of the hotel room and MV2 was sleeping. MV1 admitted to having vaginal sex. When asked if **SCOLLAY** and MV1 used a condom, MV1 initially replied, “No condom,” then recanted her statement. MV1 told Investigators that she was cleaning the room after she and **SCOLLAY** had sex and noticed an opened condom wrapper in the hotel room. She attempted to ask **SCOLLAY** if he used a condom, but **SCOLLAY** was on the phone and did not respond. Investigators asked if there was any other sexual activity, including oral sex, which MV1 denied. Investigators asked if **SCOLLAY** orally copulated MV1 which she also denied. MV1 clarified “I sucked his dick that’s all and I fucked him.” Investigators asked if **SCOLLAY** had an orgasm. She asked what that meant—if investigators were referring to **SCOLLAY** “cumming.” Investigators advised that was correct. MV1 replied, “Yah, but not in me.” She pointed to her leg and explained that **SCOLLAY** ejaculated on her leg.

27. Investigators asked if MV1 if **SCOLLAY** and the previous pimp knew each other, and MV1 replied they did not, but were talking to one another because of MV1. MV1 stated, “listen what pimps have to do, you have folks, when you choose new ones, you have to give the number to your new folks, and the new folks have to call your ex-folks and serve them.” Investigators asked what that meant. MV1 demonstrated by picking up a tissue box and simulated utilizing a telephone. MV1 began saying, “I am on the phone right, I called my ex-folk<sup>7</sup>, I’m the new folk. Hey P<sup>8</sup>, listen up your bitch is with me now. You messed up and all that shit.” MV1

---

“pimps.” MV1 was not sure why that rule was created but knew of it.

<sup>7</sup> Based on my training and experience, and in my conversations with other law enforcement officers who specialize in human trafficking investigations in the San Francisco Bay Area, I understand the term “folk” or “folks” as references to an individual or group of individuals that a commercial sex worker works for. In context here, MV1’s “ex-folks” is the previous pimp and her “new folk” is **SCOLLAY**.

<sup>8</sup> Based on my training and experience, and in my conversations with other law enforcement officers who specialize in human trafficking investigations in the San Francisco Bay Area, I understand the term “P” to

told investigators it was something similar to that. Investigators asked if the old exploiter had to pay the new exploiter any money or vice versa. MV1 replied, “nope.” MV1 advised it was just a phone call.

### C. Review of MV1’s Cellular Phone Device

28. On October 5, 2023, the Honorable Kandis A. Westmore, U.S. Magistrate Judge in the Northern District of California, granted a search warrant for the cellular device possessed by MV1 on the date of her recovery from the Oakland Airport Executive Hotel. Upon review of the device, I noted there were approximately fourteen (14) phone calls between MV1’s device and telephone number ending 9243, a T-Mobile wireless telephone number confirmed to be subscribed to by **Tobias SCOLLAY**. The first call to this device was an incoming call from **SCOLLAY** to MV1 on June 12, 2023, at 11:47 PM PST and the final call was June 14, 2023, at 3:29 PM PST.

29. In the “Contacts” section of the device, I located an individual named “Pp.” I know that commercial trafficking victims will call their trafficker “P” which is short for pimp. The telephone number associated with that contact was listed as ending 6524. This telephone number is associated to a cellular phone device recovered by the Los Angeles Police Department when **SCOLLAY** was arrested on June 19, 2023, on an unrelated State warrant.

30. There are approximately fifty-four (54) phone calls between MV1’s device and telephone number ending 6524 (believed to be possessed by **SCOLLAY**) between June 12, 2023, 8:18:14 PM PST and June 14, 2023, at 4:01:17 PM. I reviewed text messages between MV1 and “Pp” which detailed as follows:

a. On June 13, 2023, at 9:21 PM:

MV1: “I’m omw” (understood to mean “I’m on my way”)

---

be slang for “pimp” or one who controls commercial sex workers and arranges clients for them, and who take a part of their earnings in return.

**SCOLLAY:** “👉.”

b. On June 14, 2023, at 2:59 PM, **SCOLLAY** messaged MV1:

**SCOLLAY:** “Wya”  
“Bruh did you leave”  
“I was getting you yo shit wtf”  
“Why you leave”  
“I was funna come tty”  
“Just let me know wassup cause I’m bouta dip”  
“That’s fucked up I was literally just getting yo punk ass  
shit”  
“It’s good stay blessed”  
“That’s fucked up you really just fucked up shit I had going  
on nd then just gone dip you a real fag.”

31. This was the last correspondence between MV1 and **SCOLLAY**. I received notification that **SCOLLAY** was arrested by the Los Angeles Police Department on June 19, 2023, pursuant to an outstanding Ramey Warrant for an unrelated offense. **SCOLLAY** had in his possession a replica Glock handgun and two (2) cellular devices, which were seized in anticipation of a search warrant. **SCOLLAY** was booked into the Los Angeles County Jail.

32. I obtained over two-hundred jail calls made by **SCOLLAY** while in custody by the Los Angeles Sheriff’s Department from June 19, 2023, until his transfer to the California Department of Corrections and Rehabilitation on September 5, 2023. During a review of those calls, I identified several recorded calls made between **SCOLLAY** and D.M., using telephone number ending 9243—the T-Mobile number subscribed to by **SCOLLAY** and which was determined to be in possession of and utilized by D.M. at the time of the jail call.

33. In those calls, **SCOLLAY** identified himself as “Daddy” which is a term that a trafficker, or “pimp,” will require his victims to call him. In those telephone calls to D.M., **SCOLLAY** identified D.M. as his “breadwinner” and his “bottom”—terms understood to describe a female appointed by the trafficker to supervise others and report rule violations. **SCOLLAY**

coached D.M. on what hotels to stay, where to work in the Los Angeles, CA area, what to wear while out on the Los Angeles “blade,” and to deposit money made from commercial sex acts on his “books,” or jail commissary.

34. In a jail call made on June 23, 2023, **SCOLLAY** contacted D.M. on telephone number ending 9243. In that conversation, D.M. requested to return to the Oakland area. **SCOLLAY** asked D.M. where she would go and suggested renting the room on Hegenberger road for \$65 USD per day. **SCOLLAY** instructed D.M. to take an Uber back and forth between the hotel on Hegenberger and the Oakland blade. **SCOLLAY** mentioned that the hotel may have fixed the water.<sup>9</sup> In this particular jail call, **SCOLLAY** instructed D.M. to return to the Airport Executive Hotel and to take an Uber to the Oakland blade to engage in commercial sex on his behalf. **SCOLLAY** told D.M. to use some of the money she earned from engaging in commercial sex acts to pay for a hotel room and to cover her basic needs, then instructed D.M. to put the rest on **SCOLLAY**’s books (jail commissary). **SCOLLAY** told D.M. to treat his books as her personal bank account to deposit money she earned. D.M. told **SCOLLAY** that if he wants to “fuck” with her (understood to mean engaging in commercial sex work on behalf of **SCOLLAY**), **SCOLLAY** would need to give his ex-girlfriend her phone back. **SCOLLAY** told D.M. that the phone was seized by police. I submitted a Grand Jury Subpoena to Verizon Wireless, which confirmed that the phone was the device bearing telephone number ending 6524 and was, in fact, subscribed to by **SCOLLAY**’s ex-girlfriend.

35. **SCOLLAY** and D.M. also discussed MV2. D.M. said that she is going to get **SCOLLAY**’s “bitch” back, which I understand to refer to MV2 coming to stay with D.M. D.M.

---

<sup>9</sup> I recalled that on the day of MV1’s recovery from the Oakland Airport Executive Hotel (located at 150 Hegenberger Road, Oakland, CA), **SCOLLAY** complained to hotel staff that the hot water was not functioning in his hotel room.

told **SCOLLAY** that MV2 wanted to “come home,” which I understand to mean engage in commercial sex work on **SCOLLAY**’s behalf. **SCOLLAY** then told D.M. that they needed to use coded language and asked that she come to visit him. **SCOLLAY** praised D.M. for showing him loyalty.

36. **SCOLLAY** and **MARTNIEZ** again discussed their efforts to get MV2 back on a June 29, 2023, jail call. D.M. told **SCOLLAY** that MV2 wanted to come home, but only wanted to play the net, which I understand to mean posting advertisements for commercial sex dates on the internet. **SCOLLAY** provided D.M. with instructions to reconnect with MV2. D.M. told **SCOLLAY** that she would tell MV2 to bring money to show MV2 was serious about returning to work with her and **SCOLLAY**.

37. On a call from July 5, 2023, **SCOLLAY** told D.M. that he wanted her to make sure that MV2 was on board. On a July 13, 2023, jail call, D.M. asked **SCOLLAY** if MV2 ever got in touch with him and if MV2 got to Oakland. D.M. told **SCOLLAY** that she had offered MV2 a ride to Oakland, but understood MV2 was still in LA. D.M. told **SCOLLAY** that he needed to find a new way to communicate with MV2, because MV2 had blocked D.M. on Instagram.

38. I obtained several jail calls from **SCOLLAY** to MV2 between October 17, 2023, and December 21, 2023, while he was detained by the California Department of Corrections and Rehabilitation.

39. In a call dated November 20, 2023, at 9:23 AM, in minute six, I overheard the following recorded conversation between **SCOLLAY** and MV2. I believe **SCOLLAY** and MV2 are discussing the recruitment of MV1 for commercial sex, as well as admitting trafficking MV2 for commercial sex.

**SCOLLAY** stated, “I ain’t gonna lie. What’s my fault though? Cuz if I ain’t



bring that bitch through, none of that shit woulda happened.”

MV2 began to respond, “I told you...”

**SCOLLAY** interrupted, “ya’ll woulda run it up that night....we was out there 30 minutes ya’ll made \$650 together. Like, what? If I woulda...If I woulda not fucked with that bitch, on mommas, we woulda run it up the whole night.”

MV2 asked, “how did you even find that bitch? How did you even know that little bitch? Like...”

**SCOLLAY** responded, “Cuz...she...she used to fuck with my partner...before...like way before...before I even knew Destiny [D.M.]. I seen her, you feel me? And she used to be...before I knew that she was fuckin’ with bruh, she used to be on me, you feel me? Like, hella, like doin outta pocket shit, like...I know she fuck with bruh, so I thought like...”

MV2 interrupted, “that’s so crazy...”

**SCOLLAY** continued, “and I’m like, and I’m like ‘what the fuck?’ And then...so...when we came back from LA and I’m in the Benz and all that, like she seen a nigga’s ass and was like...like...she was tryin to choose up.”

MV2 asked, “How’d she see you?”

**SCOLLAY** responded, “How did she see me? Cuz I pulled up poppin’ it...fuck...you know what I do.”

MV2 asked “you was outside?” (understood to mean on the Oakland blade).

**SCOLLAY** asked MV2 to clarify, “yeah, like what we was doin...”

**SCOLLAY** responded, “yeah.”

MV2 responded, “and she was outside with a hoddie tryna make pape?”

(understood to mean make money).

**SCOLLAY** replied, “that’s like the first thing I said, on mommas, cuz she don’t ever be out there like that, I’m like, I’m like, ‘Who the fuck got you out there like this? Damn, you ain’t never had no black hair like that, did you? Was out there lookin manny” (understood to mean not appropriate).

**SCOLLAY** continued, “Never seen that before.”

MV2 stated, “Nigga that’s so crazy...she...and the cops told me her real age and showed me pictures of her school ID’s and everything. So I know they ain’t lyin about that shit.”

**SCOLLAY** replied, “That shit manny, bruh. Cuz I know about...two other niggas she was fuckin with—older than me—hella little shit. I ain’t tryna talk about that bitch though...not on the phone...like, that’s why a nigga cool bruh...that shit just ruined everything. Nigga was just cool, bruh.”

MV2 responded, “That’s your fault.”

**SCOLLAY** replied, “Shut up. I don’t wanna hear all that. Nigga for sure know better now though.”

MV2 continued, “I hopped in the car, I see a bitch and I was like ‘Ah hell nah this nigga did not just bring another bitch—yeah it’s time to go. It’s time for me to go’.”

**SCOLLAY** told MV2 that was the last thing she should have done, and she should have been “down for a nigga”.

40. MV2 told **SCOLLAY** that if he could not respect her, then she was not going to respect him. **SCOLLAY** told MV2 if she had just come to him first before dropping everything they could have worked it out. MV2 responded, “I did. I did.” MV2 and **SCOLLAY** began to

argue. MV2 told **SCOLLAY** that she remembered when he told her “not to talk to [his] bitches.” **SCOLLAY** responded that she already said she wanted to go to Los Angeles, so she was not his anymore. MV2 continued, “ok and then I was in the room asleep. And Destiny [D.M.] didn’t tell me this till afterward, cuz if she woulda told me this I woulda took off on her, but...” **SCOLLAY** interrupted, “stop saying specific names.” MV2 continued, “ok...I was in there asleep and I wake up to this bitch pullin the...pullin the covers off, and I’m like ‘no.’ I didn’t know she pulled the covers off me until what’s her name told me after all this when we went with “Ques.” But she aint tell me, cuz I...nigga, I just woke up with the covers off me...ya’ll...ya’ll was right there. I didn’t know what the fuck was happening. And this tried to (unintelligible), but she really didn’t want no...she didn’t want no pressure. She didn’t wanna do nothin cuz... and you let this bitch (unintelligible) to me and I’m lookin at you like ‘Nigga, you gonna let this bitch... she ain’t even pay you nothin and I gave you a fee. She didn’t even put no money in your pockets yet, and you letting this bitch talk to me like that? That’s weird.” **SCOLLAY** asked, “What did she say to you? What she say? I don’t even remember.” MV2 told **SCOLLAY** “she was just talkin her shit, she was like ‘you want me to tick off on her? You want me to tick off on her?’ and I’m like...” **SCOLLAY** asked if that occurred when he “pulled up on” MV2. She responded in the affirmative. **SCOLLAY**’s voice and pitch raised and he responded that MV2 was in the car “with a whole nother nigga and” and he was “bent” (upset).

41. MV2 clarified that it was not the day she was in the car, it was the day they were at the room at the hotel. MV2 recalled that MV1 pulled the covers off MV2 and told **SCOLLAY** “you gonna let this bitch sleep? You gonna let this bitch take a nap?” MV2 admonished **SCOLLAY** for just standing there and not saying anything. MV2 continued, “you know the crazy part is? I’m lookin at you an I’m like ‘I gave you a whole \$600 and plus more, plus that was before

I even came home (unintelligible), then I came and paid you more and this bitch didn't even put a dollar in your pocket and you let her talk to me like that?" SCOLLAY responded, "Yeah she did...Yeah she did though." MV2 responded, "Ok, that don't matter, she didn't pay the fee though..." SCOLLAY and MV2 begin talking over each other. SCOLLAY told her, "[MV2], I'm not trying to listen to you no more cuz I'm tryin to talk...So you right. I did things wrong. You feel me? I got my reasons why I did shit wrong. You ain't gotta agree with them, bruh, but you feel me...but...lookin forward, nigga tryna do shit differently. That's what I'm tellin you. Right now, you feel me I'm just tryna fuck with you...just me and you, you feel me? So I can get to know you better...I want you to be my bottom." SCOLLAY told MV2 he was going to call her back. The call concluded at 16:34 minutes.

**D. Investigators learn that SCOLLAY and D.M. Recruited and Sex-trafficked Minor Victim #2**

42. Upon further review of SCOLLAY's jail calls while detained at the Los Angeles County Jail and the California Department of Corrections and Rehabilitation, I noted several telephone calls with a female that SCOLLAY identified as MV2. I recalled that in her interview with law enforcement after being recovered from the Oakland Airport Executive Hotel on June 14, 2023, MV1 mentioned she was with two other females: D.M. and someone later identified as MV2.

43. In several jail calls between SCOLLAY and D.M. that occurred between June 23, 2023, and June 29, 2023, D.M. told SCOLLAY that MV2 had the choice to leave her current trafficker but chose to stay. D.M. told SCOLLAY she was going to get his "bitch" (referring to MV2) back to D.M. D.M. believed MV2 had romantic feelings for SCOLLAY. According to D.M., MV2 wanted to "come home" but only wanted to "play the net."<sup>10</sup> SCOLLAY encouraged

---

<sup>10</sup> MV2, in a later interview, described the term "play the net" as posting commercial sex advertisements on the internet.

D.M. to reconnect with MV2. D.M. told **SCOLLAY** she would tell MV2 to bring money to show she is serious about returning to **SCOLLAY** and D.M. Based on my training and experience, traffickers often mandate victims to pay a “choose-up fee” when leaving their old trafficker to begin working with a new trafficker. This is a method of proving loyalty to the new trafficker.

44. In a recorded jail call on July 5, 2023, **SCOLLAY** called MV2 on telephone number ending 4445. MV2 told **SCOLLAY** that he just woke her up. **SCOLLAY** replied, “You know what daddy gonna do. Yeah, so you miss me?” MV2 told **SCOLLAY** that her current pimp was upset with MV2 because she was talking to **SCOLLAY**. MV2 did not like her current pimp because he’s “not on the real pimpin’.” **SCOLLAY** told MV2 he learned his lesson about “bringing mother fuckers in real quick.” **SCOLLAY** told MV2 she was going to have her own room for the first two or three weeks so he can make sure MV2 is really up for him. MV2 stated, “I was never planning on leaving but you over here bringin’ some other bitches (unintelligible).” I understand this to mean that MV2 was upset with **SCOLLAY** for bringing in MV1. **SCOLLAY** responded, “I feel it. I feel it. You know what I’m sayin? But it’s just that, right now, I need a reassurance, you feel me? Cuz you ain’t been with me. You feel me? And where I’m at right now, too, so I just need to make sure everything copacetic.” **SCOLLAY** asked MV2 when she is going to go back to “the Bay” (San Francisco Bay area). MV2 told **SCOLLAY** she and her current pimp were going to be in Sacramento later. **SCOLLAY** asked her again how she planned on getting back. MV2 asked **SCOLLAY** what she was going to do when she got back to the Bay area. **SCOLLAY** told MV2 she would get a room, and asked MV2 if she had her identification card. MV2 told **SCOLLAY** she did not have an identification card. **SCOLLAY** responded that he would help MV2 get one, he would help her get situated, and get her a room. MV2 asked if **SCOLLAY** wanted D.M. to “trap” (engage in commercial sex acts) in the room. **SCOLLAY**

clarified that he wants MV2 to “trap” from the room, and D.M. would have her own room. MV2 would come together with D.M. once she’s proven to **SCOLLAY** that she’s “rockin’ for” **SCOLLAY**, because he “don’t need no bullshit around [his] bitch.” **SCOLLAY** told MV2 he does not have money on the phone.

45. MV2 told **SCOLLAY** she would put money on his phone. **SCOLLAY** told MV2 he was going to call her collect to teach her how to put money on his phone. **SCOLLAY** asked MV2 if she had a debit card, and she told **SCOLLAY** she did not have one. **SCOLLAY** told MV2 he was going to call her with D.M. and D.M. would help MV2 to get her room. **SCOLLAY** reiterated that he did not want them together until **SCOLLAY** could determine MV2 was “actually fuckin’” with him. MV2 told **SCOLLAY** she did not want to work the blade without anyone watching her. **SCOLLAY** responded, “alright. That’s what I said. You gonna play the net.” MV2 told **SCOLLAY** she does not have an account on the net. **SCOLLAY** responded, “then you gonna have to go outside then, you gonna be out there with Destiny (D.M.), ya’ll gonna be cool.” **SCOLLAY** continued to explain that when MV2 linked up with D.M. and D.M. would help her to get her identification at the Department of Motor Vehicles. **SCOLLAY** told MV2 he would call her back when he got to the dormitory.

46. In a recorded jail call on July 7, 2023, at 12:54 hours, **SCOLLAY** called MV2 on telephone number ending 4445. **SCOLLAY**: “You know my address and all that, come bring your ass up here and be with me. Come see me.” **SCOLLAY** encouraged MV2 to come visit him in jail, all she had to do is bring an identification card. MV2 responded, “What are they gonna ask for?” **SCOLLAY** replied, “You fuckin ID. Why the fuck you actin like you can’t get an ID, bruh?” MV2: “How? How am I supposed to get it?” **SCOLLAY**: “take yo ass to the DMV and get an ID. You playin.” MV2: “I’m not playin, I can’t.” **SCOLLAY**: “You grown right? You grown

right?” MV2: “I...I’m on the run from (unintelligible).” **SCOLLAY**: “That don’t matter. That do not matter bruh.” **SCOLLAY** later stated, “Bruh, look, the only thing that could be holding you up from getting your ID is you already know, bruh. Other than that, you should be able to get an ID bruh.” I understood “you already know” to mean MV2 could not get an identification card because she was not an adult. MV2 remained silent for a few moments, then explained she had never gone to the DMV to get an ID card, and asked **SCOLLAY** what she needed to do to get her ID. **SCOLLAY** asked if she knew her Social Security Number. MV2 told him no, but she could get it. MV2 asked **SCOLLAY**, “I can’t like...I can’t show them a school ID or something?” **SCOLLAY** paused for a moment, then stated, “I don’t think so...I don’t...do you got a school ID?” MV2 responded, “No, but I could get it.” Later in the conversation, **SCOLLAY** asked MV2 when she was going to put money on his books and expressed frustration about having to depend on “bitches” to support him in jail.

**E. Internet searches reveal evidence that MV2 was engaged in commercial sex work**

47. I conducted a search of available indices for any ads posted using the telephone number ending 4445—the telephone number used by MV2 to communicate with **SCOLLAY** between July 5 and July 7, 2023. The age of the female depicted is listed as twenty-one (21) years old. The female depicted in the advertisement has her face blocked out with purple devil, money bag, and “see no evil” emojis. The female is petite in size, pubescent-aged, between eleven and sixteen years, with long black hair, wearing blue lingerie and blue furry high heels and sitting on a white chair (in two photographs) and on a bathroom counter (in a third photograph).

48. I conducted a similar image search of commercial sex advertisements depicting the same image as described above—results matching eleven (11) commercial sex advertisements posted between June 17, 2023, and September 16, 2023. I noted that the images of the female

depicted in these advertisements did not contain emojis to block out the face of the female depicted. Several of the advertisements depicted a Hispanic female, pubescent-aged, between eleven and sixteen years, with long black hair, wearing blue lingerie and blue furry high heels and sitting on a white chair. I reviewed each of the eleven (11) advertisements and confirmed all contained a photograph of the female described above. Several advertisements contained multiple other unidentified females.

49. Several of the advertisements described above were flagged by Los Angeles Police Department (LAPD) Officer Daniela Herrera as depicting a suspected juvenile. I contacted Herrera, who advised the minor depicted in the advertisements was a missing fourteen-year-old female from San Bernardino, CA. Officer Herrera sent me a copy of all Los Angeles Police Department field contacts with MV2, as well as a photograph of a screenshot that was obtained by MV2's mother. I reviewed the field contact reports with MV2, which revealed she was encountered by Los Angeles Police Detectives on June 3, 2023, in the Figueroa Corridor, an area known as the Los Angeles "blade." MV2 was found with an adult-male sex buyer and returned to the custody of her mother. MV2 ran away again shortly thereafter, and was again encountered by law enforcement in San Bernardino, CA on September 6, 2023. MV2 admitted to engaging in commercial sex work and was returned to the custody of her mother. MV2 was again reported missing on September 8, 2023.

**F. MV2 is recovered and her cellular device is imaged**

50. On October 17, 2023, HSI San Francisco contacted HSI Los Angeles, HSI Riverside, and the USMS to coordinate the recovery of MV2 from an apartment in Downey, CA. MV2 was detained and taken to Downey Police Department (DPD) to await transport by LAPD to LAPD 77th Division and ultimately transferred to Department of Child and Family Services



(DCFS) custody. At approximately 1745 hours, HSI agents asked if MV2 would conduct a voluntary interview and she agreed. The following is a summary of the conversation and not a verbatim account.

51. MV2 stated she was in Oakland, CA in September 2023 for about two weeks. MV2 went to Oakland to, “make money” with other sex workers. MV2 acknowledged she knew “Destiny” (D.M.) and met **SCOLLAY**, whom she knew as “True,” in Oakland, CA. MV2 told law enforcement that **SCOLLAY** was her friend’s pimp in Los Angeles and was with a girl named “Destiny” and another thirteen-year-old girl she knew, whom MV2 knew as “Emily”<sup>11</sup> [later identified as MV1]. MV2 told law enforcement that she did not work for **SCOLLAY** and only hung out with him during their trip to Oakland. MV2 identified photographs of D.M., minor victim “MV1,” and **SCOLLAY**. According to MV2, when **SCOLLAY** found out MV1 was a minor, he made her leave.

52. On December 7, 2023, LAPD Officers searched the Apple iPhone XR with telephone number ending 8114. During a review of MV2’s device, Officer Herrera located several “screen shot” photographs which were taken between November 20, 2023, and December 7, 2023. The photographs appeared to be taken during a Facetime video call. The photographs depicted Tobias **SCOLLAY**.

#### **G. Investigators Review Further Jail Calls Between SCOLLAY and MV2**

53. I contacted Lewis LeFlore of the CDCR, who advised that inmates had access to tablet devices that would allow them to conduct video calls. LeFlore told me that **SCOLLAY** was engaged in video calls with five (5) different women. LeFlore sent a photograph taken from the video calls for each of the women, and I immediately identified MV2 as one of those women.

---

<sup>11</sup> It should be noted that MV2 never knew MV1’s name.

54. I requested all jail calls, both audio and video, conducted by **SCOLLAY**. LeFlore advised **SCOLLAY** conducted approximately four-hundred and fifty-two (452) calls between October 17, 2023, and December 21, 2023. I requested the search to initially be narrowed to calls made between **SCOLLAY** and MV2. LeFlore provided a compact disc (CD) containing approximately eighteen (18) audio-recorded jail calls between **SCOLLAY** and telephone number ending 8114 (MV2's phone number) between November 3, 2023, at 11:57:30 and November 24, 2023, at 11:43:44; and three (3) video-recorded jail calls between **SCOLLAY** and MV2 between November 28, 2023, and December 4, 2023.

55. I reviewed a call made by **SCOLLAY** to MV2's telephone number ending 8114 on November 3, 2023, at 11:57 AM. MV2 asked **SCOLLAY** where he had been, and MV2 told **SCOLLAY** she was trying to text him and trying to get in contact with him. **SCOLLAY** responded that he was at Solano State Prison in Vacaville. In minute 2:09, MV2 stated, "Look, I've also talked about a cops, bro. I got...So the cops took me in. Like they caught me with a trick.<sup>12</sup> Tell me about they show me pictures of you, Destiny [D.M.] and the little...and the little minor bitch. And they was asking me questions. Trying to build a case. The cops made you the (unintelligible)." **SCOLLAY** responded, "The police said that?" MV2 replied, "Yes. They asked me. They said, 'do you know this? Do you know who this is?' And they're like, 'his name is Tobias' and showed pictures with your face, and I was like, I was like, 'no, I didn't know him.' But I knew. And they asked me if I knew Destiny [D.M.]. I said I knew her. And I met her on the blade...on Fig, but I don't know who that (untintelligible) is wrong, you know, man, they're like, oh, don't even know her. And I was like, 'oh, I just met her on the blade.' Like, oh, I said..." **SCOLLAY** responded, "Wait, hold on. Hold on, you said you know me?" MV2 answered, "No,

---

<sup>12</sup> A "trick" is a term for a commercial sex buyer.

I said I know her, I said I knew Destiny [D.M.]. I didn't say I (unintelligible). And then they were telling me about, oh, what happened in Oakland. They're like, 'so you never paid me'. And I was like, 'no'. And they were like, 'so what happened in Oakland?' And I was like, 'what do you mean what happened in Oakland? I never been to Oakland.' They're like, 'yes, you do. We have video footage of you and him and her in the motel together and then some more.' So there (unintelligible) some weird shit. And I was like, I was like, 'no', I was just like, 'no, I never, I don't even know who that is. I never even been to Oakland (unintelligible)' like and they were just...they were just...they were just talking nigga. They...they going to build a case against all of us and you, that shit was weird what it was. I don't know why. Why you think they're asking you what happened in Oakland and why do I know you guys? I don't know." **SCOLLAY** responded, "Aint' nothin happen in Oakland." MV2: "That's what I'm saying. So why they ask me that?" **SCOLLAY**: "What? Where you was at?" MV2 replied, "I was on Fig." **SCOLLAY**: "Damn. That shit crazy, that...damn. What the fuck? That shit crazy."

56. MV2 and **SCOLLAY** redirected their conversation to catch up on what the other has been doing. MV2 disclosed that she was almost shot a few weeks prior. **SCOLLAY** asked MV2 if she was on probation. MV2 told him she was. MV2 told **SCOLLAY** she has been at home doing her "own shit." In minute 5:27, MV2 told **SCOLLAY** she still gets money, but not engaging in commercial sex acts. **SCOLLAY** asked if MV2 could put money on his books in minute 5:53. MV2 agreed that she would.

57. **SCOLLAY** told MV2 he was getting out of prison in February. MV2 that "Bro you better (unintelligible) you better hope they don't...bro you better hope they don't put no pimpin on your shit, bro." **SCOLLAY** quickly interjected, "(unintelligible) on the phone, bruh. I

hear you loud and clear. If anything ain't happen in all this time it probably ain't, you feel me?" MV2 responded, "Nah but they don't got nothin on you."

58. **SCOLLAY** later asked where MV2 was presently staying. MV2 responded she was staying in San Bernardino. **SCOLLAY** told MV2 about the HUD program that may help MV2 get an apartment. **SCOLLAY** encouraged MV2 to move to the San Francisco Bay Area and engage in in commercial sex acts for his financial benefit.

59. On a November 6, 2023, jail call, **SCOLLAY** asked MV2 what she's been doing, when she goes out (understood to mean engage in commercial sex acts), and where she goes. MV2 responded that she pays a male friend to take her to Pomona and Long Beach and watches her while she's "out." **SCOLLAY** asked MV2 to put money on his commissary. MV2 asked how much **SCOLLAY** needed, and she could get it by the following day. MV2 responded, "So that's like Friday if you need more. You have to wait till I go outside, so that's like on Friday." I understood this to mean MV2 would earn money for **SCOLLAY** by engaging in commercial sex acts, which she indicated would occur on "Friday." MV2 told **SCOLLAY** that she could get him \$20 or \$30 dollars, but if he waited until Friday, she would have "1"—understood to mean \$100. **SCOLLAY** instructed MV2 to "send that 30, try to do 50. Come up with 50, alright? And then send that one tomorrow. And then on Friday, you could just put some money on my books." MV2 told **SCOLLAY** that she previously tried to put money on his books but misunderstood what **SCOLLAY**'s booking number was. MV2 told **SCOLLAY** that she was awaiting approval from **SCOLLAY**'s facility to be able to video call.

60. **SCOLLAY** stated, "Yeah, but, on mamas though. [MV2]. We finna be locked in bruh, I'm finna come home (unintelligible)." MV2 interrupted, "we is locked in." **SCOLLAY**

continued, “I aint gonna lie, baby, you remember the first time I was like fucking?” MV2 laughed. **SCOLLAY** laughed and continued, “I hit that shit from the back and you started bleedin on me and I’m like, ‘boy what’s goin on?’ Thought you was on your period. I’m like, ‘damn, nigga had to break them walls in.’ On mamas, I’m going to come home and break that motherfucker again. Fresh out this motha fucka? You gonna be like ‘damn he gon crazy.’”

61. In a jail call dated November 7, 2023, **SCOLLAY** asked MV2 why she stuck around him. MV2 responded that it was because **SCOLLAY** was “good peoples.” **SCOLLAY** told MV2, “You know what I kinda think? I think...I think you missed this dick.” MV2 responded, “that’s it? That’s what you think it is?” **SCOLLAY** responded that it was more than that, but he thought that had a lot to do with it. **SCOLLAY** recounted the first time he saw MV2—he pulled up and she looked at him like she “saw God.” **SCOLLAY** continued “‘Look at him. Look at him. That’s Daddy over there.’ On God, I caught you off balance, huh?”

62. On November 8, 2023, **SCOLLAY** contacted MV2 and disclosed that he grew up in foster care from the age of 13 to 18 and was in and out of jail. **SCOLLAY** told MV2 that he did not feel like anyone was there for him and nobody has his back. MV2 interjected and told **SCOLLAY** he has her, and she is there for him and answers his calls every day. **SCOLLAY** responded that he has been told that before, and if MV2 really had him, she would show him by “getting this whip. Get this bag right. Like, show me that you really doing something.” **SCOLLAY** told MV2 that he did not have a car—he crashed the Mercedes Benz and the Ford got towed. **SCOLLAY** stated, “I need you to you out there, you feel me, I need you to listen to a nigga, you feel me, so I could put you in the right way, in the right position, you feel me, and do shit. You feel me. I want you to have a web. I want you to have something (unintelligible) when I come home. I want you to have a spot, you feel me. You hear me?” MV2 responded, “yeah.”

**SCOLLAY** continued, “but I don’t want to be wasting my time either, though, like, just talking to you, like, you not actually doin nothin bruh.” **SCOLLAY** continued, “but right now, you need to get, you need to run it up, you feel me? You need to get a bag right now.” **SCOLLAY** told MV2 he was skeptical of her, ever since she spoke with the cops. MV2 clarified that she spoke with the “feds.”

63. **SCOLLAY** continued to question MV2 about her interactions with the “feds” and again asked if the “fed” called MV2 on her current telephone number. MV2 confirmed they did. **SCOLLAY** told MV2 she needed to get a new phone and asked MV2 “is you really fuckin with me or what’s goin on?” MV2 responded, “yes, I mean, technically.” **SCOLLAY** responded, “Alright. Hey, you know, I don’t what that type of case, you feel me? I’m encouraging you to do some positive shit, get you a job.” MV2 laughed. **SCOLLAY** continued, “I want you to build your credit up. Get you a job, bruh. You gonna get you a job?” MV2 responded, “maybe.”

64. Later, **SCOLLAY** again asked, “hey, bruh, you on any type of shit that tryin to get me caught up?” MV2 responded, “No, what the fuck?” **SCOLLAY** asked, “are you sure? You not fuckin with the law?” MV2 again denied working with law enforcement. **SCOLLAY** instructed MV2 to get a new phone and asked if law enforcement had her social media accounts. MV2 responded that she did not post her face on social media so she would not get caught up. **SCOLLAY** told MV2 to put some money on the phone so he could facetime her later.

65. On November 20, 2023, **SCOLLAY** called and instructed her to send \$10 to “poohclutch3.” **SCOLLAY** instructed MV2 to go on the streets in San Bernardino (understood to mean engage in commercial sex work). MV2 told **SCOLLAY** she went out and made \$280. **SCOLLAY** told her “that’s cool, but you only goin out on the weekends.” **SCOLLAY** told MV2

she could go out three times a week and make near a band (understood to mean \$1,000) a week. **SCOLLAY** told MV2 eventually it's going to be a "team thing" and he wanted to make sure MV2 is really "fuckin' with" him. **SCOLLAY** told MV2 he is looking for a "bottom" (understood to be a traffickers most trusted victim). **SCOLLAY** told MV2 she could prove it by taking care of herself and taking care of him and "havin' a bag" (understood to mean large amount of cash) for **SCOLLAY** when he got out of jail.

66. I identified several jail calls between **SCOLLAY** and MV2, in which **SCOLLAY** encouraged MV2 to masturbate during the call. The calls remained sexual in nature, and **SCOLLAY** made several references to MV2 "goin crazy on that camera" when they would be able to have a FaceTime call.

67. On November 28, 2023, **SCOLLAY** called MV2 on telephone number ending 8114. The video call is four (4) minutes in duration. I immediately identified **Tobias SCOLLAY** as depicted in his California Driver's License photograph, as well as MV2, based on the photographs from MV2's Missing Child posters and commercial sex advertisements.

68. **SCOLLAY** stated, "Hey girl! What's happenin lil mamma. How you doin?" **SCOLLAY** motioned for another inmate to come within view of the camera. That inmate (unidentified), stated, "what's that? Uh...fresh face." **SCOLLAY** laughed. The other inmate left the view of the camera.

69. MV2 looked at the camera and brushed her hair from her face and puckered her lips to the camera. **SCOLLAY**: "what's up with it baby?" MV2 pulled her black t-shirt up with her right hand, revealing her right breast. **SCOLLAY** stated, "Mmm...let me see what you got on... you tryna show me something..." MV2 pulled the camera down to reveal her buttocks, anal,

and vaginal region. **SCOLLAY** responded, “hold on, I got four minutes, man” and laughed. **SCOLLAY** continued, “Yeah, let me see something, baby. Let me...let me hear you play with that shit. Don’t play with yo pussy on the camera though.” MV2 licked her fingers. **SCOLLAY** stated, “leave it on your face.” MV2 then masturbated on camera at **SCOLLAY**’s urging, showing her vagina, buttocks, breasts, and face.

#### **H. Investigators Interview MV2**

70. On January 11, 2024, HSI Agents contacted MV2’s mother, who granted consent to interview MV2 again and present new information imperative to the investigation. On January 12, 2024, HSI San Bernardino SA Michael Juneau and I interviewed MV2 at an advocacy center located in San Bernardino, CA. The following is an account of MV2’s interview with HSI Special Agents, in sum, and not verbatim.

71. MV2 told us how she got into “the life” (street vernacular for commercial sex work). MV2 described meeting **SCOLLAY**. MV2 provided, “That was in the beginning when I first got turnt out that's when I still had a pimp and I met him. He sweating me on Fig and then I thought he was cute...and then I went, and then that’s how I was textin’ him. And then I went home with him the next day...and then we went to Oakland.” I asked if **SCOLLAY** “served” her former trafficker. MV2 answered **SCOLLAY** did not, “I didn’t know what I was doing, you know. I was just...just got turnt out, like, literally it was like my first month in.” I asked if the unidentified pimp was her “turn-out pimp<sup>13</sup>”—street vernacular for the person who teaches a victim the “business” of commercial sex work. MV2 stated she did not have a turn-out-pimp. She was by herself first, then met that pimp. MV2 was with that pimp for a week or two before she met “True”

---

<sup>13</sup> A turn-out pimp is a sex trafficking victims first exploiter.



(**SCOLLAY**'s moniker). I later presented photographs of **SCOLLAY** to MV2 and she confirmed the man in the photographs was, in fact, **SCOLLAY**.

72. I asked if **SCOLLAY** treated MV2 better than her first pimp. MV2 responded, "well I was only with him for a little bit, but he's crazy." When asked to clarify, MV2 responded "ask [D.M.]—she was with him longer." MV2 met **SCOLLAY** sometime in June or July, but she could not be certain. MV2 reiterated that **SCOLLAY** was "sweating" her—understood to mean attempting to recruit her to engage in commercial sex work on his behalf. MV2 described **SCOLLAY** "sweating" her as "he got out of his car and started coming up to [her] face and started chasing [her]." MV2 did not run away, but **SCOLLAY** continued to "chase" her. **SCOLLAY** got out of his vehicle, began "rubbing" on MV2 and grabbing her buttocks and "hugging" on her. MV2 stated she was "in pocket" (understood to mean following the rules of her current pimp), so she walked away from **SCOLLAY** but thought he was "cute." MV2 texted **SCOLLAY** after she was done "working" and **SCOLLAY** met MV2 at her hotel.

73. MV2 and **SCOLLAY** began talking, and the next day she "went home" with **SCOLLAY**, traveling with him to Oakland, CA. MV2 later confirmed **SCOLLAY** drove her and D.M. in the white Mercedes. MV2 met D.M. on the drive from Los Angeles to Oakland. D.M. was in Los Angeles with **SCOLLAY**, though MV2 never met her on the Figueroa Street blade. MV2 stated she and D.M. were both asleep on the drive up. When asked if MV2 and D.M. got along, MV2 recalled that D.M. did not really like her because D.M. wanted to be **SCOLLAY**'s only girl. MV2 believed D.M. had romantic feelings for **SCOLLAY**.

74. MV2 later described paying **SCOLLAY** a "chose up fee"—understood to be a fee that MV2 paid to **SCOLLAY** to demonstrate to him that she was ready to work for him. MV2

paid **SCOLLAY** the “trap” from the previous night that she made while working for her first pimp—about \$600 USD.

75. Once they arrived in Oakland, **SCOLLAY** rented a room at a large hotel. I presented a photograph of the Oakland Airport Executive Hotel, and MV2 confirmed that was the hotel she stayed at with **SCOLLAY**.

76. Once in Oakland, **SCOLLAY** used the money to buy MV2 an “outfit” (attire worn by commercial sex workers to entice “dates”), high heels, and condoms. **SCOLLAY** also bought D.M. clothes to wear on the blade. When asked how many dates it took to make \$600, MV2 responded, “well, it depends. If I break on them then I could...then I could like...say I break on a trick, I could get that in one day.” MV2 clarified, “Like, when you get more money than what you would ask for...like, say the date is \$120, but if you break on them then you get more money out of them than what you’re supposed to, basically.” I asked how MV2 learned to get higher fees. MV2 responded, “I don’t know. I just...’cause I was in the game, so yeah, I just learned it little by little...Nobody taught me.”

77. MV2 was asked to describe the “outfits” **SCOLLAY** purchased for her. MV2 described the outfit as a “one-piece” that was blue in color, and its purpose was to make money while on the Oakland blade. **SCOLLAY** purchased for MV2 a pair of “blue fluffy” high heel shoes. I recalled seeing commercial sex advertisements for MV2 in which she was wearing a blue string bikini and blue fluffy high-heeled shoes.

78. When they arrived in Oakland, **SCOLLAY** put MV2 and D.M. “down” on the Oakland blade to engage in commercial sex acts around 7:00 PM. **SCOLLAY** drove MV2 and D.M. to the Oakland Blade in the white Mercedes. Once **SCOLLAY** dropped off MV2 and D.M., he left. I asked where **SCOLLAY** went after he dropped off D.M. and MV2. MV2 responded

that she did not know. I asked if **SCOLLAY** “sweated” other girls on the blade, to which MV2 replied, “yeah, that’s how he met the white girl.” I asked if MV2 ever saw the “white girl” on the blade before **SCOLLAY** “brought her home.” MV2 responded in the negative.

79. When she “caught a date,” MV2 had to communicate to **SCOLLAY** that she was getting into vehicles. **SCOLLAY** would respond, “ok.” MV2 described her dates as “car dates”—understood to mean sexual intercourse in a vehicle. MV2 described particular sex acts as “suck their dick with a condom, fuck them with a condom, and they get a time limit so when the time’s up, they’ll drop you back off.” MV2 described her time limits as fifteen (15) minutes, though admitted she only gave her dates about “five” minutes. When MV2 would tell **SCOLLAY** she made a date, he would “break on” her. MV2 described “break on” as when **SCOLLAY** would come and accept “the trap.” MV2 later clarified that “trap” was money made from commercial sex acts.

80. I asked MV2 how much money she made from commercial sex acts while working on the Oakland blade. MV2 responded, “Like, \$1000.” I responded, “Wow. Ok, so that’s like ten dates in two days?” MV2 nodded her head in the affirmative. I asked if **SCOLLAY** provided to MV2 enough condoms to cover that many dates. MV2 nodded her head in the affirmative. MV2 asserted, “I would never do it without a condom.” According to MV2, she did not get any money from her commercial sex acts. **SCOLLAY** kept the money for himself. **SCOLLAY** used the money to purchase clothing for MV2 or to pay for the hotel. **SCOLLAY** did not use the money to purchase marijuana or alcohol for MV2. MV2 was usually paid in cash. I asked if **SCOLLAY** deposited the money he took from MV2 into a bank account. MV2 responded she did not know, but believed **SCOLLAY** kept his money on him.

81. MV2 recalled her and D.M. being “down” (understood to mean engaging in commercial sex work on the Oakland blade) and **SCOLLAY** “brought this little girl home—whole time she was thirteen years old, but he brought the white girl—I don’t know her name—” I asked MV2 to clarify if the thirteen-year-old was the “white girl.” MV2 replied, “Yeah. So he brought the white girl home and then I was already mad because [D.M.] didn’t like me, because she wanted to be the only girl. So I was mad that he brought somebody else, ‘cause I didn’t know who she was, and she wasn’t acting...like, she was acting like a little girl, and I didn’t like how she was acting.” MV2 described the “white girl” (understood to be Minor Victim #1, MV1) as wanting **SCOLLAY** to herself and described **SCOLLAY** as “boyfriend pimpin’” (understood to mean exploiting MV1’s romantic feelings for **SCOLLAY** in order to entice her into commercial sex work). MV2 was mad at **SCOLLAY** for not telling her or D.M. that he was bringing another girl home. MV2 told **SCOLLAY** she was going to “stay inside”—understood to mean not engage in commercial sex work for him that night. MV2 described going to sleep but recalled that **SCOLLAY** and MV1 left the hotel.

82. MV2 was not present when **SCOLLAY** was “sweating” (attempting to recruit) MV1 on the Oakland blade. MV1 was already in the vehicle when **SCOLLAY** picked MV2 up from the blade. When asked if **SCOLLAY** put MV1 down on the blade, MV2 responded, “Yeah. The night that I didn’t want to go out, he put her out there.” MV2 described MV1 being brought back to the hotel to get ready. I asked if she was not already ready, as she was found on the blade. MV2 responded, “But she was in like jeans and a hoodie.” MV2 recalled that **SCOLLAY** had D.M. give her an outfit but could not recall what the outfit looked like. According to MV2, MV1 did not shower—she put on makeup and got dressed. **SCOLLAY** and MV1 left in **SCOLLAY**’s car, as the Oakland blade was a bit far from the hotel. When asked how much money MV1 made

for **SCOLLAY** that night, MV2 responded that she did not know. MV2 remembered MV1 and **SCOLLAY** leaving the hotel around 10:00 PM and returned around 5:00 AM. According to MV2, MV1 did not pay a choose-up fee to **SCOLLAY**. MV2 did not know if D.M. paid a choose-up fee.

83. MV2 later described **SCOLLAY** bringing MV1, “well, she told us she was 18, but I knew. I thought, and that’s what I kept telling Tobias (**SCOLLAY**), but he didn’t listen to me.” “You can tell by her personality that she acts like a little girl.”

84. I asked MV2 if **SCOLLAY** ever asked MV2 her age. MV2 responded, “mmm hmm” in the affirmative. I asked what MV2 told **SCOLLAY**. MV2 replied, “I was 18, but I feel like Tobias (**SCOLLAY**) has a thing for young girls, so I think he didn’t really believe me, but he believed me supposedly.” I asked, “You think he wanted to believe you’re 18?” MV2 responded, “Yeah, I didn’t have an ID or nothing, though, cuz he didn’t really care.” I asked, “Did he never ask to see your ID?” MV2 replied, “No.” According to MV2, D.M. also did not know MV2 was not 18. I asked if anyone ever questioned MV2 on her age while she was engaged in commercial sex work. MV2 responded in the affirmative, “I mean, when you work, everybody’s always gonna ask you. Yeah. Everybody.”

85. MV2 described getting into an argument with MV1 and **SCOLLAY** stood there and watched. MV2 wanted to return to Los Angeles but **SCOLLAY** refused to help her and told her she would have to figure it out for herself. MV2 recalled, “And then he was already acting crazy, like, I’ll be on my phone and I’ll be talking to people and he’ll be like calling me ‘out of pocket, bitch’ or he’ll snatch my phone from me. He would like grab me, or when I tried to get it back, he’ll like push me off and stuff like that.” **SCOLLAY** took MV2’s phone and broke it, so MV2 had no phone.

86. MV2 told D.M., and D.M. told MV2 she had someone from Sacramento who would come and pick them up. MV2 and D.M. planned to leave the following day. MV2 and D.M. slept on one bed, and **SCOLLAY** and “the white girl” (MV1) slept on the other.

87. Later on, MV2 described the night that **SCOLLAY** brought MV1 home. MV2 provided that, “She (MV1) slept with him and me and D.M. slept in the other bed.” MV2 witnessed **SCOLLAY** and MV1 having sex the following morning, and denied she was involved. MV2 recalled, “he was trying to have sex with me right after. I was like, ‘No.’” I asked, “So he knew you were awake at that time?” MV2 replied, “Yeah, because D.M. woke up and she got mad and she left.” I clarified, “So D.M. walked out while he was having sex with the minor and then he asked you?” MV2 confirmed, “Yeah.” I asked if she saw **SCOLLAY** use a condom when he had sex with MV1. MV2 responded, “He said he did, but I don’t think so. He didn’t use a condom with me, so I don’t think he used a condom with her.” I asked MV2 if pimps typically “test their product” and have sex with girls who work for them. MV2 confirmed this and added “to see if it’s (the product) worth it.”

88. MV2 stated that the following day “we wake up to them fucking. He’s fucking her. So Destiny [D.M.] got mad, and then I really didn’t get mad, but she got mad...but then he left to go to his house or whatever, and he took the white girl with him. So then that’s when we just got our stuff and we left and went to with this guy from Sac. And then he called. He called her and he’s like, ‘you’re like, you’re out of pocket bitch.’ ‘Cause I didn’t have a phone, ‘cause he broke my phone, he’s telling Destiny that she’s out of pocket and stuff like that.” I understood this to mean that **SCOLLAY** was angry at D.M. and MV2 for not following his rules.

89. **SCOLLAY** “pulled up on her and served the guy his papers and he’s arguing with the guy that we went with. And then he pulled up and he didn’t really do nothing, but he was

telling us, like, ‘bitch you’re going to end up in the hospital’ this and that. Like, he was just threatening her.” When asked the name of the pimp MV2 and D.M. left with, MV2 responded that she forgot his name.

90. I asked if MV2 and D.M. left **SCOLLAY** together. MV2 responded, “yeah.” MV2 recalled that it took three days for D.M. to return to **SCOLLAY**. MV2 reiterated that she only met the new pimp because of D.M.

91. MV2 was only with **SCOLLAY** for a few days because he was “crazy...and the girl...the white girl, I didn’t really like her.” MV2 encouraged me to speak with D.M., because D.M. was with him longer. I told MV2 I had attempted to contact D.M. but was unsuccessful. MV2 stated she did not talk to D.M. anymore.

92. I asked if MV2 and **SCOLLAY** ever had sex. MV2 confirmed they did, the first night she met him while she was on Figueroa Street in Los Angeles. **SCOLLAY** and MV2 had penis-to-vagina sex, and oral sex—they did not have anal sex, and **SCOLLAY** did not use a condom.

93. I asked about MV2 and **SCOLLAY** being in contact while **SCOLLAY** was imprisoned. MV2 responded, “Well, I just be bored so he be calling me so I just answer...but I’m not really going to go back to him. Like, if you could see in the conversation, he always asked me to send him money and stuff, which I never do. But I’m bored. And it’s something that, like, you know, I want to feel like I was just wanted, like, you know, I want to feel loved because the way he talks to me, yeah. So I just talk to him. But I don’t ever send him money or nothing. He always asked me to send him money. Like, send him a package or put money on his commissary, but I didn’t do it.” I asked MV2 where **SCOLLAY** expected her to get her money. MV2 responded, “The blade. But I haven’t been doing it. But he thinks I’ve been doing it, but I haven’t. And then

when I told him I haven't did it, he gets mad. But I haven't talked to him since like October...No, since like, December, 'cause we stopped talking, 'cause he got mad, 'cause I didn't send him no money, and I was out on the blade. So he's like, 'what do I need you for?' this and that. And then I found somebody else. I found...I was actually in a relationship with this one guy and I stopped talking to him (**SCOLLAY**).” MV2 continued, “and then, like, he called me, like, not that long ago, but he was just like asking me if I'm going to work for him when he gets out of this and that, and I told him 'no.' And he was like, 'ok, that's fine, 'cause I get'...he got a new bitch, so he doesn't call me no more.” MV2 last spoke to **SCOLLAY** in December, when **SCOLLAY** was transferred to Santa Clara County Jail. MV2 stated that **SCOLLAY** did not put money on his phone, so **SCOLLAY** did not call her anymore.

94. I asked if **SCOLLAY** ever told MV2 to go engage in commercial sex for money in order to put money on **SCOLLAY**'s phone. MV2 responded, “yeah.” I asked if MV2 ever told **SCOLLAY** she trapped to get money to put on his books. MV2 responded “uh uh” in the negative. I asked about a video call between **SCOLLAY** and MV2 in which MV2 flashed a large stack of currency to **SCOLLAY**. MV2 responded, “Yeah, but that's not even from that. That's from money that I had saved it.” MV2 continued, “Because I do other stuff than that, like, I have shoes and stuff that I don't use, so I sell them off for...that was only like 300. It was all just 20's.” I asked about the \$100 bill shown in the video. MV2 responded, “Probably was, but it was only like \$300. But I spent all that money.” I asked if MV2 was lying to **SCOLLAY** about making \$500. MV2 confirmed, and added, “But I did tell him that I was on the blade doing that, but I only told him because I wanted to talk to him still. But then when he kept asking me that and asking me and asking me to send the money, so I got tired of it and told him that I wasn't actually doing that no more and that's why he stopped calling me.” MV2 confirmed that she “was trapping in



July, yeah, but I had a pimp.” I asked MV2 if she put money on **SCOLLAY**’s books. She said she did not, but that D.M. did.

95. I disclosed that the reason I requested to meet and speak with MV2 was because I had heard recent jail calls between MV2 and **SCOLLAY** in which MV2 told **SCOLLAY** that she would go out on Friday nights, make a “band” (street vernacular for \$1,000 USD) for **SCOLLAY**, and then would come back on Saturdays to be at her mothers’ house. I expressed that I was concerned when I heard this, because I believed MV2 was endangering herself. MV2 responded, “I just told him all that cuz I was lying. But if I really had money, I would have been putting money on his books. But yeah, I just told him all that because I wanted to feel something...like, the way he talks—like you said, he’s a smooth talker, that’s what I’m sayin, so I just lied to him to make him feel like, ‘oh she’s gonna be with me when she...when I get out, she gets money for me’ like, yeah.”

96. I asked MV2 about a video call between **SCOLLAY** and MV2 in which **SCOLLAY** was “walking [MV2] through some things and [MV2] masturbating on camera.” MV2 began to giggle, “That’s funny. That’s funny. Nothing...it was just funny.” I asked, “so what happened there?” MV2 replied, “Nothing...the way he just talked to me, tell me to do that so I did it because he’s in jail. He’s horny. So yeah, I just did it.” I asked if there have been any other situations in which **SCOLLAY** has asked MV2 to take photographs or videos of herself and send them to **SCOLLAY**, specifically on the GTL<sup>14</sup> application. MV2 replied, “no, cuz I didn’t put any money on it.” MV2 deflected the question, “and then I brought it up because Destiny told me that he got that 15-year-old girl—called her or something on Instagram and told her like—‘oh Tobias (**SCOLLAY**),’ that ‘I’m pregnant by Tobias (**SCOLLAY**).’ And she doesn’t say True,

---

<sup>14</sup> Global Tell Link is an application available to CDCR inmates that, among other functions, can receive messages with video or photographs.

but she said ‘Tobias (**SCOLLAY**)’ that ‘I’m pregnant by Tobias (**SCOLLAY**).’ That’s what I’m sayin, you got to ask Destiny (D.M.). Destiny (D.M.) knows everything. I don’t know nothing about him. She’s from San Jose, so she’s around that area. I only knew him because of that. But she actually knows—Destiny (D.M.) knows the white girl’s big sister—like, she...she knows a lot of stuff—that’s what I’m saying, you gotta tell her.”

97. I again asked MV2 about the video of her masturbating for **SCOLLAY**. MV2 confirmed there were telephone calls leading up to that video call. MV2 confirmed that **SCOLLAY** has previously asked her to text photographs of herself to him. According to MV2, **SCOLLAY** told her to wear lingerie in photographs **SCOLLAY** requested. MV2 was no longer in possession of the lingerie, explaining that it was taken by the police.

98. I told MV2 that I went to speak with **SCOLLAY** while he was in jail. MV2 immediately asked what **SCOLLAY** said and asked if I told **SCOLLAY** her age. I told MV2 that I encouraged **SCOLLAY** to refrain from speaking to MV2 because MV2 was a minor. I told MV2 that **SCOLLAY** should no longer be calling MV2, and I requested to be notified if **SCOLLAY** contacted MV2 again. MV2 agreed she would tell me if **SCOLLAY** called her again. MV2 asked, “what he say? What happened?” I told MV2 she did not want to get into details, but when I urged **SCOLLAY** to refrain from talking to MV2, his “jaw hit the floor.” MV2 laughed and stated, “he doesn’t really care, like, I noticed that he likes minors.” I asked MV2 why she thinks he is drawn to minors. MV2 responded, “I don’t know, he probably just likes young girls.” MV2 later added, “Like, he just knows that he can manipulate ‘cause he’s like a manipulator. He knows he can manipulate younger girls more than older girls.” I replied, “I’m glad that you recognize that. Did you recognize that when you guys were together?” MV2 responded, “Yeah.”

99. I asked if **SCOLLAY** tried to connect her with anyone to help her place commercial sex ads online. MV2 responded that **SCOLLAY** told her to just go on Tinder. I asked if MV2 posted ads on Tinder, she responded “mmm mmm” in the negative.

100. I began to ask MV2 about the MV1. MV2 stated, “she’s younger than me” and that “her mindset is still...she don’t know what the hell she’s doing. I do.” I asked MV2 how long she was engaged in commercial sex work before she found **SCOLLAY**. MV2 responded, “like a week.” I asked how MV2 knew what to do so quickly. MV2 responded, “‘Cause its’ not that...it’s not rocket science. You go out there, you sell...you sell your body...you go...my pimp...my pimp before True tell me everything to do. So... go out there, give them the prices, get back in the car, do what you got to do, come back and get broke on.” MV2 again clarified that getting “broke on” is when the pimp takes the money earned from a commercial sex act. MV2 continued, “you go out, throw out some prices, do cash dates. You look pretty. You smile. Catch dates. Do what you gotta do and bring your money back.” MV2 disclosed that she’s almost been kidnapped before, she’s been beat, she’s been raped, she’s had a knife pulled on her, and she’s almost been killed. MV2 stated, “But that’s just what you go through. That’s like every girl experience.”

101. I asked if **SCOLLAY** ever threatened MV2. MV2 responded, “Yeah...well, he was just like, if I leave he was gonna beat me up and stuff.” Per MV2, **SCOLLAY** threatened to physically beat MV2 up, but not stab or shoot her. MV2 recalled being threatened “a couple times.”

#### **I. Investigators Review SCOLLAY’s Instagram Account**

102. On October 4, 2023, I applied for and was granted by the Honorable Kandis A. Westmore, U.S. Magistrate Judge for the Northern District of California, a search warrant to Meta Platforms, Inc. for **SCOLLAY**’s Instagram account “bagchasertrue\_\_” and his Facebook account

“Justin.Nolack.” On October 10, 2023, I received the requested material from Meta Platforms, Inc.

103. I identified the Instagram account handles for D.M. (4o8.95116), MV2, and MV1. The only message from **SCOLLAY**’s Instagram account to MV1 occurred on June 14, 2023, at 3:03 PM. **SCOLLAY** messaged “What’s good” to MV1. MV1 did not reply. The only message from **SCOLLAY**’s Instagram account to MV2 occurred on September 1, 2023, at 9:16 AM. MV2 messaged **SCOLLAY**’s Instagram account, “Call my new number XXXXXX9583.” This was the only message exchanged between **SCOLLAY**’s Instagram account and that of MV2.

104. I identified a messaging thread between **SCOLLAY** (bagchasertrue\_\_) and D.M. (Instagram account 4o8.95116) which commenced on June 14, 2023, at 12:01 AM and concluded on July 4, 2023, at 9:12 PM.

105. On June 15, 2023, at 12:02 AM, D.M. messaged **SCOLLAY**:

**D.M.:** “Lmaooooooooo”

“Bru”

“That bitch is 13.”

**SCOLLAY:** “Who?”

**D.M.:** “The bitch u with”

“Lmao u a dirty nigga fucking on kids”

“All bad I love where home is”

“Stop texting me.”

**SCOLLAY:** “👉👉.”

**D.M.:** “I wanna come home”

“Bru I'll hit u when I'm alone”

“But I gotta stop hitting me”

“You.”

**SCOLLAY:** “Ok.”

**D.M.:** “U fr gonna stop hitting me.”

**SCOLLAY:** “Yeah just be 100 wit me”

“💯💯.”

**D.M.:** “U only gonna be on sum pimp shit nun else”

“Nigga I wanna go home but I won't if u gonna be on sum weird  
ass shit.”

**SCOLLAY:** “I'm not ima be coo.”

106. **SCOLLAY** and D.M. repaired their relationship, and **SCOLLAY** asked D.M. where she was so he could go get her back. D.M. told **SCOLLAY** she was in “sac” (understood to mean Sacramento) “but he's taking us to Modesto rn so I'll hit u up once I'm back.” On June 15, 2023, while she was still with another trafficker, D.M. messaged **SCOLLAY**, “Bru u over here trippin u stay fucking hella bitches and I don't trip” “U wasn't fw me cause if u was u wouldn't have fucked that lil ass bitch In front of me.” **SCOLLAY** replied, “I fucked up.” D.M. replied, “Ik u did.” **SCOLLAY**: “I know nd I learned” “That shit was dumb I wish I never got her.” D.M.: “U was trying to fuck the other female too.” **SCOLLAY** and D.M. discussed having boundaries. D.M. asked, “How many bitches u tryna have.” **SCOLLAY**: “Idk” “Whatever works” “I just want yu n [MV2] that's it” “💯 💯.” D.M.: “U finna be fucking on them bitches that pay u” “And she ain't finna comeback.” **SCOLLAY** asked D.M. how she wanted things to be. D.M. responded, “If u gonna be talking and fucking on other bitches I should be able to do the same thing without u getting mad.” **SCOLLAY** responded, “Bruh you doing that wit on tricks” “I'm doing it with a hoe” “What's the difference” “The only thing that should matter is where we stand if I'm doing somn to make a bitch happy so she keep payin me you should understand.” D.M. later told **SCOLLAY**, “I ain't even wanna be here I wanna be with u but u trippin not everyone be getting fucked by they p.”

107. D.M. and **SCOLLAY** continued to amend their relationship and ultimately made plans for **SCOLLAY** to “get” D.M. back from the trafficker she was presently with. **SCOLLAY** told D.M., “Bruh if you coming home don't give that nigga no money from you know” “When yu get money tuck it somewhere.” **SCOLLAY** messaged D.M. and provided his telephone number as ending 9243. **SCOLLAY** messaged that he would be there in twenty (20) minutes.

108. I located a messaging thread between **SCOLLAY** and another Instagram account

which commenced on May 29, 2023, at 2:11 AM. I later identified that Instagram user as Minor Victim #3 (MV3)—seventeen-year-old minor female.<sup>15</sup> In the message thread, **SCOLLAY** told MV3, “I’m really tryna fw yu my girl really like yu we was disappointed when we didn’t see yu again last night but I know we can all be a good team together yu just gotta let me come get yu.” “If yu coo where yu at could we at least get that jacket back.” “Wya.” “Aye wya.”

109. On June 7, 2023, at 9:18 AM, MV3 started an audio call with **SCOLLAY**. On that same date, at 4:19 PM, **SCOLLAY** told MV3, “Yu be playin I could really elevate yu.” “When we gone takin trips nd yu seein it yu gone wish yu was wit us.” MV3 did not respond to **SCOLLAY**.

110. On June 14, 2023, at 1:08 AM, MV3 messaged **SCOLLAY**:

MV3: “wassup witchu n yo bitch 🤔.”  
 “shii happened outta nowhere.”  
 “that's why I wasn't talkin to you.”  
**SCOLLAY**: “Shit we good.”  
 MV3: “😐”  
 “mm okay.”  
**SCOLLAY**: “What yu doin though.”  
 MV3: “smokinn wyo.”  
**SCOLLAY**: “The room.”  
 MV3: “that's wassup, yo bitch was inside tn ?”  
**SCOLLAY**: “Naw she was out.”  
 MV3: “ohhh damn I prolly passed her or sum 🤔.”  
**SCOLLAY**: “Yu walked past her on 11 when I was bending the corner right in front of you.”  
 MV3: “smh 🤔 Ima see her next time fss.”  
 “What's her ig.”  
 “the 4o8 one ?”  
**SCOLLAY** (or someone with access to **SCOLLAY**’s Instagram account):  
 “Hey girl it’s her.” “What happened.” “My ig is [MV1’s Instagram]”

111. On June 14, 2023, between 2:14 AM and 2:19 AM, **SCOLLAY** messaged MV3:

**SCOLLAY**: “Gm”

<sup>15</sup> MV3 is known to law enforcement.

“Whenever yu free lmk.”

MV3: “I’m jus getting back to the room 🙄👉”  
 “Ima sleep but I’ll tapn when I’m up.”

SCOLLAY: “It’s good . How was yo trappin last night.”

MV3: “it was goodddd jus got hella dry towards the end ngl I started to damn near fall asleep 😭😭.”

SCOLLAY: “Lol it’s good hit me when yu ready.”  
 “Wya.”

MV3: “Vallejo wha.”  
 “wya\*.”

SCOLLAY: “Oakland.”  
 “Let me come get yu.”  
 “Can yu talk otp rn??”

MV3: “nahh I can't they all up in here on the bed.”

SCOLLAY: “We’ll how about I pull up nd I text yu when I’m there nd yu could come out wit yo shit.”

MV3: “ngl I ain't tryna flake on you or nun but I'm prolly gonna catch the greyhound back to where I stay at n handle shii than slide back out here inna week or sum.”

SCOLLAY: “Damn.”  
 “I could take you that way.”

MV3: “it's farr 😭.”

SCOLLAY: “Where.”

MV3: “reno.”

SCOLLAY: “I’m tryna go out there anyway.”  
 “I’m leavin Thursday.”

MV3: “firr so tmr ?”

SCOLLAY: “Damn near no Friday that’s check out.”

MV3: “okk bett.”  
 “how long you staying in reno.”

SCOLLAY: “I’m tryna just stay out there but going back n forth to different states.”  
 “Aitee wya.”  
 “Wya.”

MV3: “Vallejo still.”

SCOLLAY: “I’m coming.”

MV3: “I’m prolly gonna head out idk yet.”

SCOLLAY: “Yu gone let me come get you ?”  
 “Who?”

MV3: “he like damn near my bigger brother.”

SCOLLAY: “What happened.”

MV3: “they was in Santa Rosa n ig sum shii happened between him n his bitch at the mall to where she stole n got caught so they ran to the car n she wouldn't get in the car even tho the police was right there so he left her n went onna high speed but while he was onna freeway he flipped his shii so now they got him inna hospital.”

**SCOLLAY:** “Omg.”

**MV3:** “yea sionk what'd abt to happen I ain't talked to her n they won't let me up to see him bc I'm not family.”

**SCOLLAY:** “Damn.”

“Wya rn.”

**MV3:** “leavin the V to go to this game wbu.”

**SCOLLAY:** “Omw to LA.”

This was the last message sent from **SCOLLAY** to **MV3**, dated June 17, 2023, at 11:37 AM.

#### **J. Investigators Identify and Interview Minor Victim #3, MV3**

112. I conducted a publicly available search of the Instagram account belonging to **MV3**. The profile picture for the account depicts a post-pubescent Caucasian female, aged between 13 and 17, who has reddish brown hair, and who is wearing a black-colored tank top with midriff exposed. The image appears to be taken in the mirror of a hotel bathroom. I conducted an image search of commercial sex advertisements using that profile picture. I received a positive match for twelve (12) commercial sex advertisements posted on MegaPersonals.com, with services listed in the “North Bay Area” and “Oakland” and an associated contact telephone number of ending 0988.

113. Upon review of the commercial sex advertisements, I noted that the profile picture utilized in the Instagram account was the same photograph depicted in the advertisements. I also noted the advertisements were flagged as being a suspected juvenile, noting prior law enforcement contact with Detective Vincent Armlin of the Sparks, NV Police Department. I contacted Detective Armlin, who advised **MV3** was previously missing from Sparks, NV. **MV3** was recovered with the assistance of the Oakland Police Department in July 2023 and was found to be with a trafficking group unrelated to this investigation.

114. I requested of Detective Armlin interview **MV3** to determine her knowledge of **SCOLLAY** and any victims engaging in commercial sex work for **SCOLLAY**'s financial gain. I



provided photographs of **SCOLLAY**, D.M., MV1, and MV2 and requested Detective Armlin present the photographs to MV3 without background information or knowledge of the case against **SCOLLAY**.

115. On November 7, 2023, Detective Armlin conducted a virtual interview with MV3. Detective Armlin told MV3 he was going to present several photographs to her on behalf of Homeland Security Investigations, who was investigating a subject that she may be familiar with.

116. Detective Armlin first presented the photograph of **SCOLLAY** as depicted on his Instagram Account, “bagchasertrue\_\_.” MV3 responded, “wait...oh that’s umm..oh that’s umm...what’s his name? I remember...I know him cuz he hit me up on Instagram...I know him...umm..” When asked if MV3 remembered the subjects Instagram name, she responded, “No, umm...I know him cuz he has a..he has a dog...a small dog...he has, like, um, hazel eyes...He had this one girl...and...he picked me up with this one girl...and umm...she had a puffer jacket on...and basically they were basically tryin to take me home with them. And...ummm..whats it called. He kept buggin me about it. I stole her...um...I stole her puffer jacket.” MV3 could not recall **SCOLLAY**’s name. While Detective Armlin was preparing to show MV3 a second photograph, MV3 stated, “Oooh I’m tryin to remember...I think it starts with a T.”

117. Detective Armlin presented a second photograph of **SCOLLAY** as depicted in **SCOLLAY**’s California Driver’s License. MV3 told investigators she thought it was the same guy. MV3 told Detective Armlin that when “he” (**SCOLLAY**) picked her up, he did not have that type of hair style—he had shorter wavier hair. Detective Armlin asked MV3 if it was the same man who hit her up on Instagram. MV3 responded, “he...he was...like for a while he kept askin...askin...he bugged me every minute for every hour like ‘Oh when you gonna come home,

when you gonna come home' 'I pick you up right now' like 'get your stuff I'll pick you up right now.'"

118. Detective Armlin presented a photograph of D.M.. MV3 responded, "Yeah that's her!" MV3 told Detective Armlin she did not recall the name of the female depicted in the photograph, but added, "But that's the girl that I stole the puffer jacket from."

119. Detective Armlin presented a photograph of MV1. MV3 did not recognize the photograph of MV1. Detective Armlin presented a photograph of MV2. MV3 did not recognize the photograph of MV2.

120. MV3 told Detective Armlin she met **SCOLLAY** on East 14th and International Boulevard in Oakland, CA. MV3 described **SCOLLAY** as "basically harassing (her) for a while." Detective Armlin asked if **SCOLLAY** was harassing MV3 in person or online. MV3 responded, "in person." According to MV3, **SCOLLAY** somehow found out what her Instagram account was. **SCOLLAY** attempted to befriend MV3 on Instagram, but MV3 initially ignored him. MV3 was on the Oakland Blade and met "the girl" (D.M.). D.M. began talking to MV3, and at one point, told MV3 "Come on, let's go over here." D.M. took MV3 to **SCOLLAY**'s vehicle. They went down the street and smoked. MV3 recalled **SCOLLAY** had a tan-colored dog in the back seat of the vehicle. MV3 and D.M. returned to the Oakland Blade afterwards. D.M. was wearing a puffer jacket. MV3 described "snatching" D.M.'s puffer jacket, then going on a "date." When she was finished with her date, she left **SCOLLAY** and D.M. MV3 described **SCOLLAY** as getting mad at MV3. MV3 mimicked **SCOLLAY**, "'Oh...umm...umm...she misses you...come on...let's just come home. I'll come pick you up' and he knew this other dude...um...I think his name like PK or something, and he stayed at the Capri."

121. MV3 recalled being harassed by **SCOLLAY** after she chose to leave him. MV3 returned to the blade and described that **SCOLLAY** attempted to “get” her. I understood this to mean **SCOLLAY** was attempting to recruit MV3 from her current trafficker to engage in commercial sex work on **SCOLLAY**’s behalf. MV3 stated, “The street would go this way (indicating it was a one-way street). He would flip a U-y and go back on the street like this and, like, chase me with his car. And one day, I was on the back streets and he was still chasing me and he’s like...but he hopped out on foot and tried to get at me tryna to like, take me home with him. I was just like, no, like...” MV3 described stringing **SCOLLAY** along when he continued to harass her on Instagram. MV3 described giving **SCOLLAY** excuses as to why she could not “come home” to him, for example, that she was on probation. According to MV3, **SCOLLAY** told her he would help her to check in with her probation officer. Detective Armlin asked MV3 to clarify what “come home” meant. MV3 stated, “come home, like...come home means like come home to the team...like...like...mean your wifey.” Detective Armlin asked, “So basically trying to recruit you?” MV3 responded, “Yeah.” MV3 described being with **SCOLLAY** and D.M. for about twenty minutes in person. Detective Armlin asked MV3 if **SCOLLAY** was attempting to get her to “choose up” (street vernacular for selecting a new pimp). MV3 responded, “basically, yeah...” MV3 described an incident in which she was with her “peeps” (understood to mean the group of people she was found with in July 2023). **SCOLLAY** approached MV3 while she was with her group and **SCOLLAY** was driving erratically to approach MV3.

122. Detective Armlin asked MV3 if she ever did a “date” for **SCOLLAY** (engaged in commercial sex for his profit). MV3 responded, “I was supposed to do that one date with that trick and bring back the money for him (**SCOLLAY**), but I didn’t bring back money for him...cuz like...like I said, I went on that date, but the trick dropped me off back at the motel room.”

Detective Armlin asked MV3, “So you did the date, and it was supposed to be for him, but you ended up taking the money to (her known trafficker)?” MV3 responded “yeah.”

123. Detective Armlin asked MV3 if she ever gave **SCOLLAY** money for clothes. MV3 responded she did not. Detective Armlin asked MV3 if she contacted **SCOLLAY** after the day she was with him on the Oakland blade. MV3 responded that she “lagged” for a few days, but **SCOLLAY** kept harassing her, so she told him she would go back to him. MV3 returned to the area on the Oakland blade where **SCOLLAY** was, and **SCOLLAY** continued to harass her. MV3 last messaged **SCOLLAY** on Instagram about “three or four days” before she was encountered by police.

124. Detective Armlin stated, “So it sounds like he was tryin to...to knock<sup>16</sup> you...cu...like...basically since he met you.” MV3 responded, “Yeah.” Detective Armlin: “and you were just, like, ‘Nah.’” MV3: “Yeah...before...before even on my Instagram he was still tryna knock me... but that’s the crazy part cuz I don’t know how he got my Instagram cuz I never gave him my Instagram. And even when...even when his uh...that girl was tryna like recruit me on the blade too I never gave him my Instagram either cuz I don’t know...I know...I know what you tryna do cuz I would do it to other girls too. I’m not stupid. He tryna recruit me.” MV3 laughed and continued, “I was like ‘No!’”

125. Detective Armlin presented a photograph of D.M., and asked if she was **SCOLLAY**’s bottom (most trusted victim). MV3 responded, “I think so, cuz at the time, that was the only person he had.” MV3 reiterated she did not know who the other two females were (MV1 and MV2). MV3 recalled it was just **SCOLLAY** in the driver’s seat, D.M. in the passenger’s seat, and the dog in the back seat.

---

<sup>16</sup> I understand the term “knock” to mean attempting to lure a trafficking victim away from her current pimp/exploiter.

**K. Investigators Interview Tobias SCOLLAY**

126. On January 10, 2024, HSI Special Agent Matthew Peele and I proceeded to the Elmwood Correctional Facility of the Santa Clara County Jail located at 701 S Abel Street, Milpitas, CA 95035 to interview Tobias **SCOLLAY**. At 10:44 AM PST, **SCOLLAY** was read his rights per Miranda, and agreed to waive those rights to speak with us.

127. **SCOLLAY** immediately asked if we were there to speak with him because of his Ramey warrant. I told **SCOLLAY** we were not there to speak to him about his Ramey warrant, or his pending court date in Santa Clara County.

128. **SCOLLAY** provided his basic biographical information, including his name and birthdate. I asked about **SCOLLAY**'s family and **SCOLLAY** told us he had no contact with his family. **SCOLLAY** provided his California Driver's License number. **SCOLLAY** was asked about his email address, and he stated he did not have one. **SCOLLAY** was asked his telephone number, and **SCOLLAY** told us he did not remember. **SCOLLAY** told agents he is unmarried, is not presently in a relationship, and has no girlfriends.

129. **SCOLLAY** worked at CEO—Center Employment Opportunities—which collaborated with Cal Trans to clean up the side of the freeways. **SCOLLAY** worked for CEO for about three months. **SCOLLAY** worked between 8am and 4pm and was paid \$100 each day. **SCOLLAY** was paid daily.

130. I asked **SCOLLAY** if he had any social media accounts. **SCOLLAY** responded, "no." I asked, "none at all? You don't have an Instagram account, Facebook...anything like that?" **SCOLLAY** again responded in the negative.

131. **SCOLLAY** was asked if, as an adult, he ever had sexual contact with a minor. **SCOLLAY** responded, "no." **SCOLLAY** was asked if he has ever seen pornography involving

children. **SCOLLAY** responded, “no.” **SCOLLAY** was asked if he has ever sent or received child pornography. **SCOLLAY** responded, “no.” **SCOLLAY** was asked if he has ever asked a minor to produce child pornography. **SCOLLAY** responded, “no.” **SCOLLAY** was asked if he ever used social media to recruit any women into commercial sex work. **SCOLLAY** responded, “no.” **SCOLLAY** was asked if he ever used social media to recruit minors into commercial sex work. **SCOLLAY** responded, “no.” **SCOLLAY** was asked if he ever paid for sex with a minor. **SCOLLAY** responded, “no.” I provided **SCOLLAY** with the definition of coercion and asked if **SCOLLAY** ever forced or coerced anyone to engage in prostitution. **SCOLLAY** responded, “no.” **SCOLLAY** was asked if he ever helped a minor to engage in prostitution. **SCOLLAY** responded, “no.” **SCOLLAY** was asked if he ever observed a minor engage in prostitution. **SCOLLAY** responded, “no.” **SCOLLAY** was asked if he recruited or ever attempted to recruit a minor to engage in prostitution. **SCOLLAY** responded, “no.” **SCOLLAY** was asked if he ever drugged a minor, to which he replied, “no.”

132. I encouraged **SCOLLAY** to tell the truth and advised that there were legal consequences to lying to federal agents. I produced a photograph of thirteen-year-old MV1, and told **SCOLLAY** I was going to give him a moment to sit with the photograph and determine if he wanted to change any of his previous statements. **SCOLLAY** immediately stated, “What.” I told **SCOLLAY** that Agents pulled the “young girl” from a hotel room that was rented and paid for by **SCOLLAY**, and **SCOLLAY** was observed by law enforcement at that hotel on the day of MV1’s recovery. I asked **SCOLLAY** if he wanted to reconsider any of the answers to the previous questions that he provided to law enforcement. **SCOLLAY** stated, “no.”

133. I disclosed that the recovery of MV1 put **SCOLLAY** on the radar of law enforcement. When **SCOLLAY** was arrested by the Los Angeles Police Department, he had two

phones, which were presently in the custody of HSI. Since **SCOLLAY** was arrested by the LAPD, HSI agents have been listening to his jail calls—over six hundred at the point of the interview. I disclosed that dozens—if not nearly one-hundred of those phone calls were between **SCOLLAY** and two females that were connected to the “situation” in Oakland. I told **SCOLLAY** that there was plenty of physical evidence, provided by **SCOLLAY** himself in his jail calls, that implicate him. I told **SCOLLAY** that the only thing agents did not have was **SCOLLAY**’s side of the story before they move forward. **SCOLLAY** replied, “alright.” I asked if **SCOLLAY** wished to start over. **SCOLLAY** nodded his head in the affirmative.

134. I asked if **SCOLLAY** wished to share his side of the story. **SCOLLAY** responded, “um, I don’t know what story there is. Like, I don’t know this girl.” **SCOLLAY** described meeting MV1, “I...just...knew her...like, I talked to her a couple times and...I never knew...like...nothin about her.” I asked, “Where did you meet her?” **SCOLLAY** responded, “I met her...in Oakland.” I replied, “The first time or the second time?” **SCOLLAY**: “Like...the firs...the first time.” I continued, “Ok. And when abouts was that?” **SCOLLAY**: “I don’t remember...but...I think I should have an attorney present with me...um talkin. Cuz I don’t know where things is goin.” I told **SCOLLAY** that was his right and I was not going to ask him any more questions. I concluded the interview and recording at 10:56 AM PST and turned off the recording device.

135. While the device was off, **SCOLLAY** asked what he was going to be charged with. I warned **SCOLLAY** that his question may lead to further questions and advised that if **SCOLLAY** wished to continue the conversation without an attorney present, SA’s could re-start the recording and proceed with the conversation. SA Peele told **SCOLLAY** that it was important for **SCOLLAY** to tell the truth to agents, and it was better to tell agents he did not want to answer

questions, than to lie in his answers. I asked if **SCOLLAY** wanted to continue the interview, and **SCOLLAY** declined and insisted he did not lie to agents. **SCOLLAY** again asked what he was going to be charged with. I told **SCOLLAY** that, for his protection and ours, I was going to resume the recording to document the interaction.

136. At 11:00 AM PST, I began recording again. I verbally documented **SCOLLAY**'s request to know the "charges" against him, and **SCOLLAY**'s insistence that he did not previously lie to agents. I told **SCOLLAY** that I have been investigating **SCOLLAY** for recruitment of a minor for human trafficking and commercial sex work. I told **SCOLLAY** that federal law states that someone who trafficked a minor does not necessarily need to know their actual age, but rather show reckless disregard for the age of the victim. I told **SCOLLAY** that I was investigating allegations that he was involved with sex trafficking three (3) different minors. I told **SCOLLAY** I wanted to give him a chance to hear his side of the story, and also I wanted to respect his decision to obtain counsel prior to further questions from us. I asked if **SCOLLAY** had any further questions. **SCOLLAY** responded, "No, that's it." I concluded the interview at 11:04 AM PST.

137. Before leaving, I presented a photograph of MV2 and told **SCOLLAY** it would be in his best interest to refrain from communicating with 14-year-old victim MV2. **SCOLLAY** nodded his head. **SCOLLAY** was escorted out of the interview room by Santa Clara County Deputies.

138. On March 18, 2024, after **SCOLLAY** was released from the jail, I received notification that he contacted MV2 from telephone number ending 8991. I reviewed a screen shot of the communication which read "Can't believe you was a minor the whole time. You lyin." I noted on the screenshot that the avatar associated with the telephone number is the same as **SCOLLAY**'s Instagram account avatar.



## CONCLUSION

139. Based on the above information, I believe there is probably cause to believe that **Tobias Dylan SCOLLAY** for enticed, recruited, maintained, and/or transported a minor victim who had not reached the age of 18, to engage in a commercial sex act, and such actions were in or affected interstate commerce, in violation of Title 18 U.S.C. § 1591 and that **Tobias Dylan SCOLLAY** and a co-conspirator conspired to entice, recruit, maintain, and/or transport a minor victim who had not reached the age of 18, to engage in a commercial sex act, and such actions were in or affected interstate commerce, from May 2023 through November 2023 in the Northern District of California, in violation of Title 18 U.S.C. § 371.

/s/ Brittany Portez

Brittany Portez  
Special Agent  
Homeland Security Investigations

Subscribed and sworn before me by telephone in accordance with the requirements of Fed. R. Crim. P. 4.1 and 4(d) on this 2nd day of July 2024.



---

HON. DONNA M. RYU  
Chief Magistrate Judge